1 EXECUTIVE SUMMARY

Since the early 1990's, the California Regional Water Quality Control Boards have issued Phase I municipal National Pollutant Discharge Elimination System (NPDES) storm water permits throughout California. The Phase I permits were generally issued to operators of municipal separate storm sewer systems (MS4s) that served urbanized areas of more than 100,000 people. In 1999, the United State Environmental Protection Agency (USEPA) issued new regulations, known as the Phase II regulations, which expanded the NPDES storm water permit program to include coverage of small MS4 systems. Small MS4 systems include traditional systems operated by cities, counties, and special districts serving under 100,000 people, and non-traditional systems serving universities, community colleges, primary schools, other publicly owned learning institutions, military bases, prisons, and hospitals.

The State Water Resources Control Board recognized that issuing individual or even group NPDES storm water permits to the large number of entities subject to the Phase II regulations would present a regulatory burden and a burden on permittees to submit individual applications. Accordingly, the State Water Resources Control Board elected to utilize a "general permit" approach for regulating the small MS4s, an approach that had proven effective for regulation of industrial sites and construction sites. The State Water Resources Control Board issued Water Quality Order No. 2003-0005-DWQ, National Pollutant Discharge Elimination System Permit No. CAS000004, Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Small MS4 Permit).

In certified correspondence dated May 26, 2004 from the California Regional Water Quality Control Board Central Valley Region (CRWQCBCV), Elk Grove Unified School District was notified that the District was being designated for coverage under the General Small MS4 permit as a non-traditional MS4 (See Appendix A). The designation notification requires that the District submit a Notice of Intent (NOI) and a Storm Water Management Program by November 25, 2004. The Regional Board cited rapid growth and the associated construction of new schools as reasons for designating the District.

The Elk Grove Unified School District Storm Water Management Program includes eight control measures designed to control the District's discharge of pollutants to storm water to the maximum extent practicable (MEP). The eight control measures are:

- Program Management
- Public Education
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Management
- Post Construction Storm Water Management
- Pollution Prevention and Good Housekeeping
- Transportation Facility Storm Water Management

The District's proposed program includes the Program Management and Transportation Facility Storm Water Management control measures. These two measures are in addition to the six minimum control measures set forth in the General Small MS4 Permit. These two control measures were added to the proposed program in order to have a consolidated and fully functional Storm Water Management Program at Elk Grove Unified School District.

The Elk Grove Unified School District is responsible for school and ancillary facility construction projects that are subject to the General Construction Permit, and for transportation services that are subject to the General Industrial Permit. Since a storm water discharge can only be covered by one NPDES permit at a time, the District's Storm Water Management Program specifically excludes coverage of any discharge subject to either the General Construction Permit or the General Industrial Permit. However, the District recognizes the value of an integrated program to comply with all of its current and future NPDES permits, so it has elected to include the management of its General Construction Permit and General Industrial Permit compliance programs as part of the District's Storm Water Management Program.

The Elk Grove Unified School District submitted its NOI and the Storm Water Management Program to the CRWQCBCV by the November 2004 deadline. In July 2005, the District received comments on the Storm Water Management Program from the CRWQCBCV. The District subsequently reviewed and evaluated the comments received, and has prepared this updated Storm Water Management Program for submission to the CRWQCBCV.

The Elk Grove Unified School District Storm Water Management Program will be available for public review for a period of at least 60 days following its resubmittal. During the review period, the CRWQCBCV will receive comments from the public. Based on public comments during the public review period, the CRWQCBCV will determine whether a formal public hearing before the Regional Board is required before granting the Elk Grove School Unified District coverage under the General Small MS4 Permit.

2 INTRODUCTION

2.1 NATIONAL & STATE ENVIRONMENTAL SETTING

2.1.1 IMPAIRED RECEIVING WATERS

Receiving water impairment occurs when, as a result of pollution or contamination, designated beneficial uses of the receiving water are unreasonably compromised. In California, the beneficial uses of receiving waters are set forth in water quality control plans or basin plans developed by the nine Regional Water Quality Control Boards. The basin plans establish the beneficial uses of the State's waters and the water quality objectives required to protect those beneficial uses.

Key Definitions

Pollution means an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects the waters for beneficial uses or facilities which serve these beneficial uses.

Contamination means an impairment of the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of disease. Contamination includes any equivalent effect resulting from the disposal of waste, whether or not waters of the state are affected.

The United States Environmental Protection Agency (USEPA) reports that pollutants transported by urban runoff are the leading cause of impairment for nearly 40 percent of U.S. water bodies not meeting water quality standards. The USEPA also reports that pollutants in urban runoff are leading causes of beach closings.[1]

In California, the State Water Resources Control Board (SWRCB) found that, "Urban Runoff is a leading cause of pollution throughout California."[2]

In Sacramento County, the California Regional Water Quality Control Board Central Valley Region (CRWQCBCV) found that the beneficial uses of water bodies in the Sacramento region were impaired or threatened by pollutants contained in municipal storm water discharges and that these pollutants can have damaging effects on human health and the environment.[3]

In summary, both state and federal water quality regulatory authorities agree that urban runoff is a significant source of water pollution and is causing declines in fisheries, restrictions on swimming, and limiting society's ability to enjoy all of the benefits that water resources provide.

---

[1] United States Environmental Protection Agency, Enforcement Alert, Volume 4, Number 1, January 2001.
[2] State Water Resources Control Board, , Water Quality Order No. 2003-0005-DWQ, NPDES General Permit No. CAS000004, Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Permit), Finding 1.
[3] California Regional Water Quality Control Board Central Valley Region, Order No. R5-2002-0206, NPDES No. CAS082597, Waste Discharge Requirements for County of Sacramento and Cities of Citrus Heights, Elk Grove, Folsom, Galt, and Sacramento Storm Water Discharges from Municipal Separate Storm Sewer Systems Sacramento County, Finding 18.

2.1.2 AFFECTS OF URBAN RUNOFF QUALITY

2.1.2.1 POLLUTANTS IN URBAN RUNOFF

Storm water runoff is part of a natural hydrologic process and naturally contains numerous constituents. However, urbanization and the resultant urban activities typically increase constituent concentrations in urban runoff to levels that impact water quality. Pollutants in urban runoff have many potential sources. Some of the most common sources of pollutants in urban runoff include:

- Urban activities such as landscape maintenance, vehicle use and maintenance, home maintenance, outdoor material storage, construction, etc.
- Impervious surfaces such as streets, rooftops, and parking lots. Impervious urban surfaces accumulate pollutants from drips, spills, aerial fallout, dumping, etc.
- Illegal dumping of pollutants to storm drains.

Pollutants in storm water runoff associated with urbanization and urban activities include:

- Sediment
- Nutrients (e.g., nitrogen and phosphorus fertilizers)
- Pathogens (e.g., bacteria, viruses, and protozoa)
- Petroleum products and polynuclear aromatic hydrocarbons (e.g., oil, grease, and fuel)
- Heavy metals (e.g., copper, lead, zinc, and cadmium)
- Organics (e.g., pesticides, herbicides, and PCBs)
- Oxygen-demanding substances (e.g., decaying vegetation)
- Trash and debris

Nutrient-rich stagnant storm water runoff can also provide an attractive habitat for vector production (e.g., mosquitoes) when it accumulates and stands for more than 72 hours.

2.1.2.2 RUNOFF AS THE POLLUTANT TRANSPORT MECHANISM

Urban runoff's role in the pollution process is usually as the transport mechanism for urban contaminants, moving pollutants from their sources (Section 2.1.2.1) and carrying them to receiving waters. Urbanization is critically linked to this pollutant transport mechanism in three ways.

- Dry-weather runoff from urban activities such as landscape irrigation runoff, vehicle washing, sidewalk rinsing, hydrant flushing, and other water-intensive activities picks up and carries contaminants to storm drains and to receiving waters.
- Wet-weather rainfall runoff from impervious surfaces such as streets, rooftops, and parking lots washes accumulated contaminants from these surfaces and carries them to storm drains and to receiving waters.

- Dry-weather and wet-weather runoff flowing into storm drains can wash contaminants that accumulate in storm drains into receiving waters.

The pollutant transport process is aggravated by the increase in the number of rainfall events causing runoff and by the increase in total runoff in urban areas. This phenomenon is the result of the increases in impervious surfaces that result from urbanization. As the amount of impervious surface increases, the amount of rainfall that becomes runoff increases. The small, low-intensity storms that fully percolated before urbanization now cause runoff, and the storms that caused runoff before urbanization now result in even more runoff. The more frequent runoff and the increased volume of runoff mean more opportunities for transport of contaminants to receiving waters.

2.1.2.3 HYDROLOGIC CONDITIONS OF CONCERN

The effects of increases in the number of runoff events and quantity of runoff resulting from urbanization are not limited to contaminant transport. The changes in runoff patterns can have a profound affect on downstream hydrology. The changes in hydrology manifest themselves in increased runoff volume, velocity, and duration and all of these factors can have a destabilizing affect on downstream channel stability, in-stream biodiversity, and habitat. When changes in hydrology resulting from urbanization produce destabilizing conditions, the changes constitute an alteration in the quality of waters of the State and thereby causing or contributing to an impairment of receiving waters.

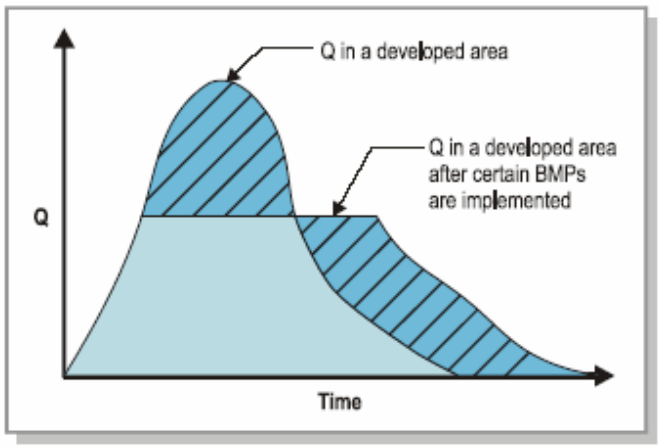

Figure 1 - Urbanization Changes Hydrology

The destabilizing effects of increased impervious surfaces are most pronounced in small, natural, and upstream watersheds where even the slightest changes can have profound impacts. However, the effects have also been observed in large drainage areas with extensive flood control improvements where channels may be stable from erosion but flushed clean of small aquatic organisms.[4]

[4] California Stormwater Quality Association, California Stormwater Best Management Practice Handbook – New Development and Redevelopment, January 2003.

2.2 REGULATORY SETTING

2.2.1 REGULATIONS

2.2.1.1 CLEAN WATER ACT

The Clean Water Act (CWA) is the cornerstone of surface water quality protection in the United States. The CWA does not deal directly with groundwater or with water quantity issues. The statute employs a variety of regulatory and non-regulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. These tools are employed to achieve the broader goal of restoring and maintaining the chemical, physical, and biological integrity of the Nation's waters so that they can support "the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water."

For many years following the passage of CWA in 1972, USEPA, states, and Indian tribes focused mainly on the chemical aspects of the "integrity" goal. During the last decade, however, more attention has been given to physical and biological integrity. Also, in the early decades of the CWA's implementation, efforts focused on regulating discharges from traditional "point source" facilities, such as municipal sewage plants and industrial facilities, with little attention paid to runoff from streets, construction sites, farms, and other "wet-weather" sources.

Starting in the late 1980s, efforts to address polluted runoff have increased significantly. For "non-point runoff", voluntary programs, including cost-sharing with landowners are the key tool. For "wet-weather point sources" like urban storm sewer systems and construction sites, a regulatory approach is being employed.

Evolution of CWA programs over the last decade has also included something of a shift from a program-by-program, source-by-source, pollutant-by-pollutant approach to more holistic watershed-based strategies. Under the watershed approach equal emphasis is placed on protecting healthy waters and restoring impaired ones. A full array of issues are addressed, not just those subject to CWA regulatory authority. Involvement of stakeholder groups in the development and implementation of strategies for achieving and maintaining state water quality and other environmental goals is another hallmark of this approach.[5]

The Clean Water Act sets forth the following objective, goals, and policies:

- Objective
  - To restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.

[5] U.S. Environmental Protection Agency, Introduction to the Clean Water Act, March 13, 2003 (http://www.epa.gov/watertrain/cwa/index.htm).

- Goals
  - Eliminate the discharge of pollutants into navigable waters by 1985.
  - Attain water quality which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and on the water by July 1, 1983.
- Policies
  - Prohibit the discharge of toxic pollutants in toxic amounts.
  - Provide Federal financial assistance to construct publicly owned waste treatment works.
  - Develop and implement area-wide treatment management planning processes to assure adequate control of sources of pollutants in each state.
  - Make a major research and demonstration effort to develop technology necessary to eliminate the discharge of pollutants into navigable waters, waters of the contiguous zone, and the oceans.
  - Expeditiously develop and implement programs for the control of non-point sources of pollution so as to enable the goals of the Clean Water Act to be met through the control of both point and non-point sources of pollution.
  - Recognize, preserve, and protect the primary responsibilities and rights of the states to prevent, reduce, and eliminate pollution, to plan the development and use (including restoration, preservation, and enhancement) of land and water resources.
  - Provide support to aid research relating to the prevention, reduction, and elimination of pollution, and to provide Federal technical services and financial aid to state and interstate agencies and municipalities in connection wit the prevention, reduction, and elimination of pollution.
  - Federal agencies shall co-operate with state and local agencies to develop comprehensive solutions to prevent, reduce, and eliminate pollution in concert with programs for managing water resources.

Key features of the Clean Water Act directly applicable to storm water management programs include:[6]

- Establishes the National Pollutant Discharge Elimination System (NPDES) permitting program to regulate discharges to surface waters.
- Requires states to identify the beneficial uses of each water body and to adopt water standards for the water body that when achieved, will provide for the designated beneficial uses of the water.
- Requires states to identify all the water bodies that are "impaired" because they fail meet established water quality standards. For impaired water bodies, the states are required to determine the pollutant loads the water bodies can tolerate and still meet water quality standards and provide for the designate beneficial

[6] Merced County Association of Governments, White Paper Discussion of San Joaquin Valley Wastewater Needs, Page 7, July 2003.

uses. The pollutant load so determined is referred to as the Total Maximum Daily Load (TMDL) for the water body.
- Requires states to carry out a continuing planning process for water quality protection which forms the basis of the state's water quality regulatory program.

2.2.1.2 PORTER-COLOGNE WATER QUALITY ACT

The Legislature of the State of California has declared that the people of the State have a primary interest in the conservation, control, and utilization of the water resources of the State, and that the quality of all the waters of the State shall be protected. Furthermore, the Legislature declared that activities which may affect the quality of the waters of the State shall be regulated to attain the highest water quality which is reasonable, considering all demands on the resource while considering the economic, social, tangible, and intangible benefits and costs. The regulation governing water quality in California is known as the Porter-Cologne Water Quality Control Act, California Water Code Division 7.[7]

Key features of the Porter-Cologne Water Quality Control Act include:

- Established the SWRCB as the State water quality control agency for all purposes stated in the Federal Water Pollution Control Act and any other federal act.
- Established the nine CRWQCBs with responsibility for the coordination and control of water quality in each Board's designated region.
- Established State policy for water quality control which shall consist of all or any of the following:
  - Water quality principals and guidelines for long-range resource planning, including groundwater and surface water management programs and control and use of recycled waters.
  - Water quality objectives at key locations for planning and operation of water resources development projects and for water quality control activities.
  - Other principles and guidelines deemed essential by the State Water Resources Control Board for water quality control.
  - All principles, guidelines, and objectives shall be consistent with the State goals of providing a decent home and suitable living environment for every Californian.
- Provisions permitting the SWRCB to establish a reasonable fee schedule to cover the costs incurred by the SWRCB and CRWQCBs in connection with any certificate that is required or authorized by any Federal law with respect to any existing or proposed facility, project, or construction work upon the quality of waters of the State. Costs to be recovered include reviewing applications, prescribing terms, enforcement, evaluation, sampling, analysis, and administration among other things.

[7] Porter-Cologne Water Quality Control Act, California Water Code, Division 7, §13000 et seq.

Key features of the Porter-Cologne Water Act directly applicable to storm water management programs include:[8]

- Does not discriminate, unlike the Clean Water Act, between point and non-point sources of water pollution.
- Regulates discharges to surface water, groundwater, and to dry land.
- Utilizes a water quality-based approach to pollution control, as opposed to technology standards-based approach.

2.2.2 ENFORCEMENT

2.2.2.1 US ENVIRONMENTAL PROTECTION AGENCY

The USEPA's authority under the Clean Water Act includes development, implementation, and enforcement of all aspects of the NPDES program. USEPA's responsibilities include the regulation of discharges of pollutants from point sources to waters of the United States, including the establishment of effluent limits on an industry-wide (technology based) basis and on a water-quality basis to ensure protection of receiving waters.

The Clean Water Act authorizes the USEPA to permit states to propose an "in-lieu" regulatory program whereby the state assumes responsibility for the permitting, administration, and enforcement of the NPDES program within the state. In states with an approved, in-lieu water quality regulatory program, the USEPA still retains an oversight responsibilities and has in fact pre-empted the state regulatory agencies when the USEPA has determined that the state's program or progress in implementing their program were not adequately protecting waters of the United States. For example, in California, a state with an "in-lieu" regulatory program, the USEPA has adopted TMDLs for impaired receiving waters despite the State's parallel, but somewhat delayed efforts to adopt TMDLs for the same impaired waters.

2.2.2.2 STATE WATER RESOURCES CONTROL BOARD

The Porter-Cologne Water Quality Control Act establishes the SWRCB as the primary agency in the State for coordinating and implementing the water quality control program in the State. As a State with an "in-lieu" water quality regulatory program approved by the USEPA, the SWRCB, through the Porter-Cologne Water Quality Control Act, is the designated State agency for all purposes stated in the Federal Water Pollution Control Act and other Federal acts.

The SWRCB formulates and adopts State policy for water quality control and coordinates the activities of the nine CRWQCBs to achieve a unified and effective water quality control program in the State. With respect to enforcement, the SWRCB adopted the

[8] Merced County Association of Governments, White Paper Discussion of San Joaquin Valley Wastewater Needs, Page 7, July 2003.

Water Quality Enforcement Policy in 2002.[9] The purpose of the policy is to provide for fair, firm, and consistent water quality enforcement throughout the State.

2.2.2.3 REGIONAL WATER QUALITY CONTROL BOARDS

The Porter-Cologne Water Quality Control Act establishes nine CRWQCBs to work in concert with the SWRCB to implement the Act. The nine CRWQCBs, which reflect regions of the State with unique precipitation, topography, population, recreation, agriculture, industry, and economic development, are responsible for administration, implementation, and enforcement of the State's water quality regulatory program within their respective watershed-based boundaries. In most instances, it is the regional water quality control boards that lead the enforcement of NPDES permits in their respective regions, including administration, implementation, and enforcement of locally-issued NPDES permits and the NPDES general permits issued by the SWRCB.

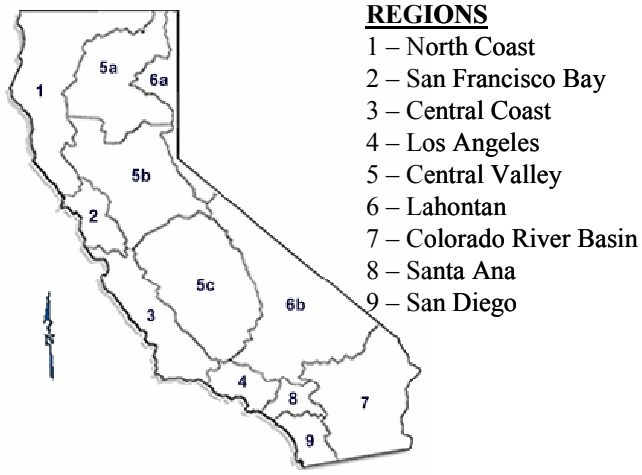

Figure 2 - RWQCB Regions

The Elk Grove Unified School District is located in Region 5 which corresponds to the California Regional Water Quality Control Board Central Valley Region (CRWQCBCV).

2.2.3 NPDES PERMITS

2.2.3.1 PHASE I MUNICIPAL PERMITS

Since the early 1990's, the CRWQCBs have issued Phase I municipal NPDES storm water permits throughout California. The Phase I permits were generally issued to operators of municipal separate storm sewer systems (MS4s) that served urbanized areas of more than 100,000 people. The urban areas were based on definitions developed by the U.S. Census. Because many MS4 systems are interconnected, most of the Phase I municipal NPDES storm water permits were issued as "area-wide" permits. Area-wide permits name the individual MS4 system operators in an urban area as "co-permittees" to the area-wide permit, and also designate one agency, usually the agency responsible for area-wide flood control, as the "principal permittee." This approach to permitting interconnected systems and for permitting urbanized areas often meant that cities with

[9] State Water Resources Control Board, Water Quality Enforcement Policy, February 19, 2002 (http://www.swrcb.ca.gov/plnspols/wqep.doc).

populations far less than 100,000 people were permitted under the Phase I NPDES storm water permit program.

Under the area-wide permits, each individual co-permittee and the principal permittee are responsible for implementing the area-wide permit as it applies within their respective jurisdiction, and for participating in and cooperating with other interconnected system operators as part of the area-wide program. The principal permittee has the additional responsibility of overall coordination of the area-wide program.

One notable exception is the NPDES storm water permit issued to the California Department of Transportation (Caltrans). Caltrans operates drainage systems throughout the State and was initially issued NPDES storm water permits by several CRWQCBs. Caltrans subsequently applied for and obtained a single state-wide NPDES permit. The Caltrans state-wide NPDES permit was developed and issued by the SWRCB.

The Phase I NPDES storm water permits have one common element. The common element is a requirement to develop and to implement a Storm Water Management Plan to reduce the discharge of pollutants to the maximum extent practicable (MEP). Since many Phase I permits are now in their third terms (permits are issued for a period of five years), the current permits focus primarily on permit implementation, and to a lesser degree on program development. However, because the MEP standard changes over time, program development continues to be an important component of the evolution of storm water programs.

Sacramento County NPDES Phase I Permit

Order No. R5-2002-0206
NPDES No. CAS082597

Permittees
County of Sacramento
City of Citrus Heights
City of Elk Grove
City of Folsom
City of Galt
City of Rancho Cordova
City of Sacramento

In Sacramento County, a Phase I permit, Order No. R5-2002-0206, NPDES No. CAS082597, was issued to the County of Sacramento and the cities of Citrus Heights, Elk Grove, Folsom, Galt, Rancho Cordova, and Sacramento.

2.2.3.2 GENERAL PERMITS

2.2.3.2.1 GENERAL INDUSTRIAL PERMIT

The SWRCB issued the first general permit for discharges of storm water associated with industrial activities in 1991, and in 1992 amended the monitoring requirements. The amended permit remained in effect until 1997, when the current permit, Water Quality Order No. 97-03-DWQ, National Pollutant Discharge Elimination System, General Permit No. CAS000001, Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities (General Industrial Permit) was subsequently adopted by the SWRCB. Since NPDES permits are issued for up to five years, General Permit No. CAS000001 has been extended until a new general permit can be adopted. The new General Industrial Permit is now expected in 2006.

The General Industrial Permit regulates discharges associated with 10 broad categories of industrial activities. Coverage under the General Industrial Permit is obtained by filing a Notice of Intent (NOI) to comply with the permit with the SWRCB, and payment of the requisite fee. Once covered under the General Industrial Permit, the facility operator is required to:

- Eliminate unauthorized non-storm water discharges
- Develop and implement a storm water pollution prevention plan (SWPPP)
- Perform monitoring of storm water discharges and authorized non-storm water discharges

The SWPPP is the cornerstone of the industrial permit program. The SWPPP is a site specific plan that identifies potential sources of pollutants from the industrial site, and then sets forth a program of best management practices (BMPs) to eliminate or reduce these sources of pollutants. BMPs in the industrial SWPPP must achieve the performance standard of best available technology economically achievable (BAT) and best conventional pollutant control technology (BCT).

Monitoring is an important component of the General Industrial Permit. Most facilities will conduct their own inspections, visual monitoring, and sampling and analysis, and use the results to fine-tune their SWPPP and BMP implementation. The General Industrial Permit provides opportunities for group monitoring, allowing groups of common industrial facilities to perform group monitoring to reduce costs and to improve program performance.

Statewide, there are thousands of industrial sites covered by the General Industrial Permit. The Elk Grove Unified School District is covered under the General Industrial Permit for its transportation facilities. The District's program was developed with assistance of the Schools Insurance Authority.

2.2.3.2.2 GENERAL CONSTRUCTION PERMIT

The SWRCB issued the first general permit for discharges of storm water associated with construction activity in 1992. The permit remained in effect until 1999, when the current permit, Water Quality Order No. 99-08-DWQ, National Pollutant Discharge Elimination System, General Permit No. CAS000002, Waste Discharge Requirements for Discharges of Storm Water Associated with Construction Activity (General Construction Permit) was subsequently adopted by the SWRCB. Since NPDES permits are issued for up to five years, General Permit No. CAS000002 has been extended until a new general permit can be adopted. The new General Construction Permit is expected in late 2006 or early 2007, after issuance of the General Industrial Permit.

There have been two significant amendments to the General Construction Permit since it was issued. The first amendment was made in 2001 and added specific sampling and analytical procedures, in addition to the existing visual inspections, to verify that BMPs are preventing further impairment by sediment in storm waters discharged directly into waters listed as impaired for sediment or silt, and are preventing other pollutants, that are

known or should be known by permittees to occur on construction sites and that are not visually detectable in storm water discharges, from causing or contributing to exceedances of water quality objectives. The second amendment was made in 2003. Initially, only projects disturbing five or more acres of soil were subject to the permit; the changes in 2003 reduced the disturbed soil threshold from five acres to one acre to be consistent with the Phase II rule and expansion of the coverage of the NPDES storm water permitting program.

The General Construction Permit regulates discharges associated with construction activity. Coverage under the General Construction Permit is obtained by filing a NOI to comply with the permit with the SWRCB, and payment of the requisite fee. Once covered under the General Construction Permit, the site owner is required to:

- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP)
- Eliminate or reduce non-storm water discharges
- Perform inspections of all BMPs

The SWPPP forms the foundation of the program to control the discharge of pollutants from a construction site. The objectives of the construction site SWPPP are

- To identify the sources of sediment and other pollutants that affect the quality of storm water discharges
- To describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in storm water as well as non-storm water discharges

A SWPPP is a site specific plan of appropriately selected, installed, inspected, and maintained BMPs. Key elements of the SWPPP include: a site description addressing the characteristics of the construction site; descriptions of BMPs for erosion and sediment control; descriptions of BMPs for construction waste handling and disposal; descriptions on how approved local plans will be implemented; proposed post-construction controls, including description of local post-construction erosion and sediment control requirements; and non-storm water management.

Monitoring is an important component of the General Construction Permit. Monitoring includes both visual site inspections to verify BMP performance, and water quality monitoring under the 2001 amendment. Water quality monitoring includes sampling and analysis for sediment when there are discharges directly to a receiving water that is sediment impaired, and for non-visual pollutants when, due to past uses of the site, exposure of pollutants to rainfall or runoff, or failure of BMPs, there is a potential for the non-visible pollutants to be discharged from the site.

Statewide, thousands of sites are subject to the General Construction Permit. The Elk Grove Unified School District is covered by the General Construction Permit for most of its new school construction program.

2.2.3.2.3 GENERAL SMALL MS4 PERMIT

NPDES storm water permits were initially issued to operators of MS4s serving urban areas of 100,000 or more people or operators of interconnected MS4s in large urban areas. However, in 1999 the USEPA issued new regulations, known as the Phase II regulations, which expanded the NPDES storm water permit program to include coverage of small MS4 systems.

The SWRCB recognized that issuing individual or even group NPDES storm water permits to the large number of entities subject to the Phase II regulations would present a regulatory burden and a burden on permittees to submit individual applications. Accordingly, the SWRCB elected to utilize a "general permit" approach for regulating the small MS4s, an approach that had proven effective for regulation of industrial site and construction sites.

The SWRCB issued Water Quality Order No. 2003-0005-DWQ, National Pollutant Discharge Elimination System Permit No. CAS000004, Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Small MS4 Permit).

Entities subject to the General Small MS4 Permit fall into three categories:

- Entities designated by USEPA in 40 CFR Section 122.32(a)(1) because it is located within an urbanized areas defined by the Bureau of Census. Automatically designated entities are listed in Attachment 1 of the General Small MS4 Permit.
- Traditional Small MS4s that serve cities, counties, and unincorporated areas that are designated by the SWRCB or a CRWQCB after consideration of factors including high population density, high grow or growth potential, significant contribution of pollutants to an interconnected MS4, discharges to sensitive waters, and a significant contribution of pollutants to waters of the United States. Entities designated by the SWRCB or a CRWQCB at the time the permit was adopted are listed in Attachment 2 of the General Small MS4 Permit.

Key Definitions

Small MS4 means an MS4 that is not permitted under the municipal Phase I regulations, and which is "owned or operated by the United States, a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity.

Regulated Small MS4 means entities designated by USEPA in 40 CFR Section 122.32(a)(1) (Permit Attachment 1) and traditional small MS4s serving cities, counties, and unincorporated areas that are designated by the State Water Resources Control Board or a California Regional Water Quality Control Board (Permit Attachment 2).

Non-Traditional MS4 means a storm water system serving public campuses (including universities, community colleges, ***primary schools, and other publicly owned learning institutions*** with campuses), military bases, and prison and hospital complexes within or adjacent to other regulated MS4s, or which pose significant water quality threats.

- Non-traditional small MS4s that are located within or discharge to a permitted MS4 and those that pose significant water quality threats. Non-traditional MS4s that are anticipated to be designated for coverage under the permit are listed in Attachment 3 of the General Small MS4 Permit. Non-traditional small MS4s not listed in Attachment 3 may be designated by the SWRCB or a CRWQCB at any time.

Coverage under the General Small MS4 Permit is obtained by submitting a Notice of Intent (NOI) seeking coverage under the General Small MS4 Permit along with a Storm Water Management Program (SWMP) and the appropriate application fee. Submittal of the NOI, SWMP, and application fee does not automatically result in coverage under the General Small MS4 Permit. A Ninth Circuit Court ruling in Environmental Defense Center Vs. USEPA dated January 14, 2003 requires that applications for coverage under the permit be made available to the public and be reviewed by the permitting authority and be determined to meet the maximum extent practicable (MEP) performance standard before coverage starts. Typically, this process will take place during a 60 day review period that commences upon submittal of the application for permit coverage.

Coverage under the General Small MS4 Permit requires the permittee to:

- Develop and implement a Storm Water Management Program (SWMP)
- Reduce its discharge of pollutants to the MEP
- Annually report on the progress of SWMP implementation

The cornerstone of the small MS4 storm water program is the development and implementation of a Storm Water Management Program (SWMP). The SWMP is expected to be implemented in phases, with full implementation by the end of the permittee's permit coverage, usually five years from the date coverage under the General Small MS4 Permit commences. The phased implementation of the SWMP allows the permittee time to fully develop their storm water storm water management program and to grow into this often responsibility.

The SWMP must address the following six elements:

- Public education
- Public participation
- Illicit discharge detection and elimination
- Construction site storm water runoff control
- Post construction storm water management
- Pollution prevention and good housekeeping

The Elk Grove Unified School District has been designated as a non-traditional MS4 subject to the General Small MS4 Permit.

2.3 EGUSD STORM WATER MANAGEMENT PROGRAM

2.3.1 DESIGNATED NON-TRADITIONAL SMALL MS4

In certified correspondence dated May 26, 2004 from the CRWQCBCV, Elk Grove Unified School District was notified that the District was being designated for coverage under the General Small MS4 permit as a non-traditional MS4. A copy of the designation letter is in Appendix A. The designation notification requires that the District submit an NOI and a SWMP by November 25, 2004.[10] The CRWQCBCV cited rapid growth and the associated construction of new schools as reasons for designating the District.

2.3.2 COORDINATION WITH OTHER PERMITS

2.3.2.1 PHASE I MUNICIPAL PERMITS

The Elk Grove Unified School District generally overlies municipalities covered by the Phase I Sacramento County MS4 permit. The designation notification gave the Elk Grove Unified School District the option of becoming a co-permittee under the Phase I permit; however, the letter also stated that becoming a co-permittee would require reopening the existing Phase I permit. Reopening an existing Phase I permit to add an additional party to the permit would require a timeframe far more than the 180 day timeframe for obtaining NPDES coverage provided by the notification letter. Accordingly, the Elk Grove Unified School District is applying for coverage under the General Small MS4 Permit, but will keep its future options open for becoming a co-permittee when the Phase I permit is renewed in 2007.

2.3.2.2 GENERAL INDUSTRIAL PERMIT

Elk Grove Unified School District is covered by the General Industrial Permit for its transportation related facilities. Since a storm water discharge can only be covered by one NPDES permit at a time, the District's Storm Water Management Program specifically excludes coverage of any discharge subject to the General Industrial Permit. However, the District recognizes the value of an integrated program to comply with all of its current and future NPDES permits, so it has elected to include the management of its General Industrial Permit compliance programs as part of the District's Storm Water Management Program.

[10] Elk Grove Unified School District is exempt from MS4 permit fees as set forth in Attachment 6 to Water Quality Order No. 2003-0005-DWQ, National Pollutant Discharge Elimination System General Permit No. CAS000004, Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems. November 25 and November 26, 2004 are State holidays and the offices of the California Regional Water Quality Control Board will be closed. In correspondence dated November 23, 2004, Regional Board staff authorized submittal of the SWMP the first workday following the deadline and will consider said submittal to be compliant with the submittal deadline. Accordingly, the SWMP will be submitted on Monday, November 29, 2004.

2.3.2.3 GENERAL CONSTRUCTION PERMIT

Elk Grove Unified School District is covered by the General Construction Permit for its construction projects that disturb one acre of more of soil. Since a storm water discharge can only be covered by one NPDES permit at a time, the District's Storm Water Management Program specifically excludes coverage of any discharge subject to the General Construction Permit. However, the District recognizes the value of an integrated program to comply with all of its current and future NPDES permits, so it has elected to include the management of its General Construction Permit compliance programs as part of the District's Storm Water Management Program.

2.3.3 ORGANIZATION OF THE SWMP

The Elk Grove Unified School District's Storm Water Management Program (SWMP) is organized as follows:

- **Section 1 – Executive Summary**. This section provides a brief overview of the Storm Water Management Program.
- **Section 2 – Introduction.** This section introduces the reader to the environmental and regulatory setting under which the General Small MS4 Permit was issued and this Storm Water Management Program was developed.
- **Section 3 – Elk Grove Unified School District.** This section provides details about the District including details on the service area, services provided, organization of the District, population served, District facilities, storm sewer systems, and regional environmental setting.
- **Section 4 – Storm Water Management Program Control Measures**. This section presents the District's Storm Water Management Program and addresses the six required control measures specified in the General Small MS4 Permit. The Storm Water Management Program includes the following six control measures: public education and outreach; public participation; illicit discharge detection and elimination; construction site storm water runoff control; post construction storm water management; and pollution prevention and good housekeeping.
- **Section 5 – Implementation Schedule.** This section presents a schedule for implementation of the Storm Water Management Program over the five years following approval of the Storm Water Management Program.
- **Section 6 – Program Assessment.** This section presents a process for assessing the implementation of the Storm Water Management Program, record keeping, and reporting.
- **Appendices** – The appendices include information related to the Storm Water Management Program.

2.4 DEFINITIONS, ACRONYMS, AND ABBREVIATIONS

The following definitions, acronyms, and abbreviations are used in this SWMP:

Best Management Practices (BMPs) – Best management practices means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of 'waters of the United States." BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

California Regional Water Quality Control Board (CRWQCB) – Reference to one or more of the nine California Regional Water Quality Control Boards.

California Regional Water Quality Control Board Central Valley Region (CRWQCBCV) – Used specifically when referring to the California Regional Water Quality Control Board Central Valley Region.

Clean Water Act (CWA) – The Federal Water Pollution Control Act Amendments of 1972 and subsequent amendments. The full text of the Clean Water Act is available at the following address: http://www.epa.gov/r5water/cwa.htm#ECWA.

Contamination – An impairment of the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of disease. Contamination includes any equivalent effect resulting from the disposal of waste, whether or not waters of the state are affected.

Elk Grove Unified School District (District, EGUSD)

General Construction Permit – Water Quality Order No. 99-08-DWQ, National Pollutant Discharge Elimination System, General Permit No. CAS000002, Waste Discharge Requirements for Discharges of Storm Water Associated with Construction Activity.

General Industrial Permit – Water Quality Order No. 97-03-DWQ, National Pollutant Discharge Elimination System, General Permit No. CAS000001, Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities.

General Small MS4 Permit – Water Quality Order No. 2003-0005-DWQ, National Pollutant Discharge Elimination System Permit No. CAS000004, Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems.

National Pollutant Discharge Elimination System (NPDES)

Maximum Extent Practicable (MEP) - The technology-based standard established by Congress in CWA section 402(p)(3)(B)(iii) that municipal dischargers of storm water must meet. Technology-based standards establish the level of pollutant reductions that dischargers must achieve. MEP is generally a result of emphasizing pollution prevention and source control BMPs as the first lines of defense in combination with structural and

treatment methods where appropriate serving as additional lines of defense. The MEP approach is an ever evolving, flexible, and advancing concept, which considers technical and economic feasibility. As knowledge about controlling urban runoff continues to evolve, so does that which constitutes MEP. The individual and collective activities elucidated in the MS4's SWMP become its proposal for reducing or eliminating pollutants in storm water to the MEP.

Municipal Separate Storm Sewer System (MS4) – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that are owned or operated by the United States, a State, city, town, boroughs, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or designated and approved management agency under section 208 of the CWA that discharges to waters of the United States. This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

Non-Traditional MS4 – A storm water system serving public campuses (including universities, community colleges, primary schools, and other publicly owned learning institutions with campuses), military bases, and prison and hospital complexes within or adjacent to other regulated MS4s, or which pose significant water quality threats.

Pollution – an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects the waters for beneficial uses or facilities which serve these beneficial uses.

Porter-Cologne Water Quality Control Act – California Water Code Division 7, Water Quality. The full text of the Porter-Cologne Water Quality Control Act is avaialbe at the following address: http://www.swrcb.ca.gov/water_laws/docs/portercologne.pdf.

Regulated Small MS4 – Entities designated by USEPA in 40 CFR Section 122.32(a)(1) (Permit Attachment 1) and traditional small MS4s serving cities, counties, and unincorporated areas that are designated by the State Water Resources Control Board or a California Regional Water Quality Control Board (Permit Attachment 2).

Small MS4 – A MS4 that is not permitted under the municipal Phase I regulations, and which is "owned or operated by the United States, a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity.

Storm Water Management Program (SWMP) – This document constitutes the Storm Water Management Program for the Elk Grove Unified School District.

State Water Resources Control Board (SWRCB)

Storm Water Pollution Prevention Plan (SWPPP) – A site-specific plan that identifies potential pollutants at a site and the best management practices selected to eliminate or reduce the discharge of the identified pollutants. The specific requirements of a SWPPP are included in the General Industrial Permit and the General Construction Permit.

United States Environmental Protection Agency (USEPA)

2.5 CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for the gathering of the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By:

_____ _____

Constantine Baranoff Date
Associate Superintendent
Elk Grove Unified School District

For information regarding the Elk Grove Unified School District Storm Water Management Program, please contact the following:

Lee Leavelle
Senior Construction Manager
Facilities and Planning
9510 Elk Grove – Florin Road
Elk Grove, CA 95624
Phone: (916) 686-7711
Fax: (916) 686-7754
Email: lleavell@egusd.net

3 ELK GROVE UNIFIED SCHOOL DISTRICT

3.1 SERVICE AREA

Elk Grove Unified School District is located in southern Sacramento County, California. The District covers 320 square miles, which is approximately one-third of Sacramento County.

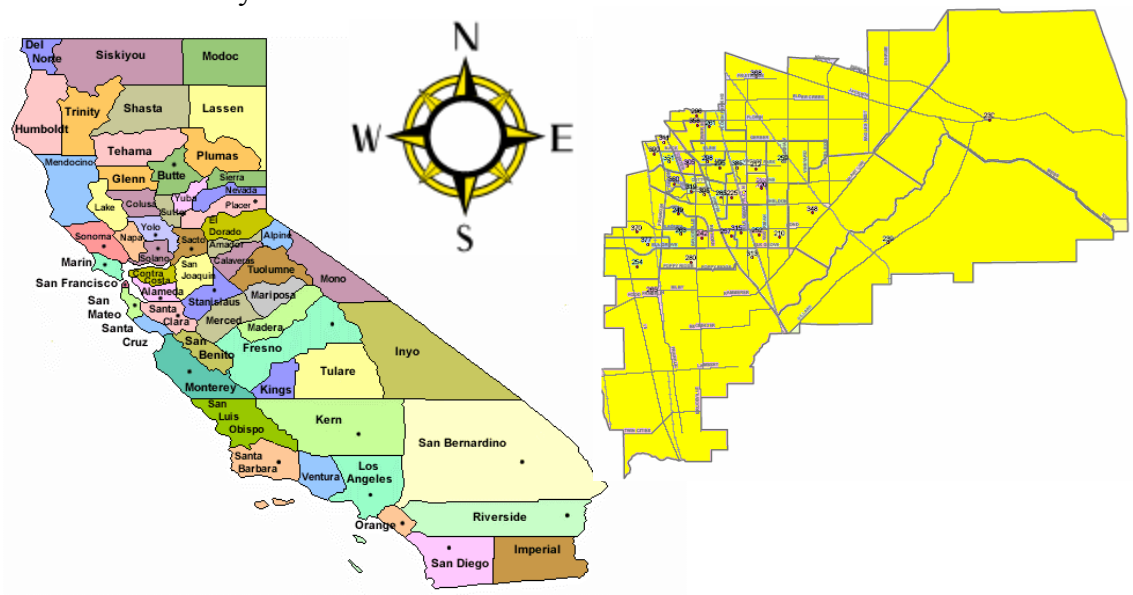

Figure 3 – Elk Grove Unified School District Service Area

The District's primary administrative office is located in Elk Grove at the following address:

Robert L. Trigg Education Center
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

3.2 SERVICES PROVIDED

The mission of the Elk Grove Unified School District is to "…provide a learning community that challenges all students to realize their greatest potential." To accomplish the mission, the District provides elementary school, middle school, high school, continuation school, special education school, independent study, and adult school education programs throughout the District's 320 square mile service area. The District's educational programs are supported by a variety ancillary programs.

3.3 ORGANIZATION

The Elk Grove Unified School District is lead by a Board of Education with seven elected board members serving staggered four-year terms. The Board of Education is lead by the President of the Board of Education. The District Board is supported by an appointed Superintendent. The Superintendent is responsible for implementing all

decisions made by the Board of Education, managing the District's day-to-day operations, carrying out the District's mission, and providing leadership for the District on all matters. The Superintendent is in turn supported by a Chief of Staff, Assistant Superintendent, and Directors responsible for various aspects of the District's educational program and ancillary support programs. The following table lists the areas of educational support within the Elk Grove Unified School District.

Elk Grove Unified School District
Educational Support Programs

- Adult and Community Education
- BTTI
- Chief of Staff
- Communications
- Custodial Services
- Curriculum and Professional Learning
- Education Services
- Elementary & Middle School Education
- Facilities and Planning
- Finance and School Support
- Fiscal Services
- Food & Nutrition Services
- Grant Writer
- Human Resources
- Learning Support Services
- Maintenance and Operations
- Payroll
- Police Services
- Prevention and Intervention
- Printing Services
- Psychological Services
- Purchasing and Warehouse
- Research and Evaluation
- Risk Management
- Secondary Education
- Special Education
- Summer School
- Student Services
- Superintendent
- Teacher Education Institute
- Technology Services
- Transportation

3.4 POPULATION SERVED – CURRENT AND FUTURE

3.4.1 STUDENTS

Elk Grove Unified School District's 2005-06 student population is more than 60,000, with more than seven new students being enrolled every day. At this rate of enrollment, the District is growing at rate of one new classroom of students every three to five days. This growth rate means that the Elk Grove Unified School District is one of the fastest growing school districts in the United States. By 2010, the District expects to be serving 80,000 students. Growth will continue beyond 2010 as houses continue to be constructed in the Elk Grove Unified School District in southern Sacramento County.

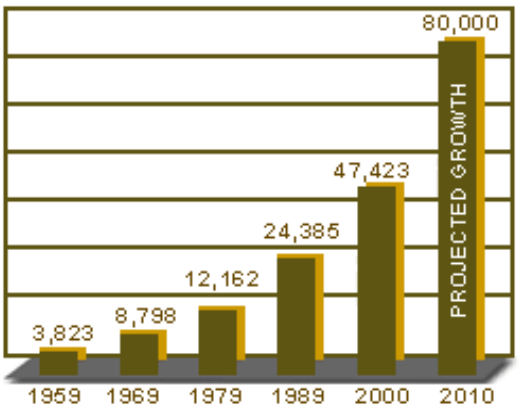

Figure 4 – Student Enrollment

3.4.2 STAFF

Elk Grove School District employs a staff of approximately 4,500 to carry out the District's mission to provide a learning community that challenges all students to realize their greatest potential. Staff employed by the District fall into three categories: certificated personnel, classified employees, and office and site administrators. Certificated personnel include teachers, nurses, librarians, psychologists, and others who provide services that require credentials from the State of California. Classified employees are support personnel in positions such as secretaries, accountants, bus drivers, mechanics, painters, and custodial staff. Office and site administrators (management employees) include principals, vice principals, instructional leaders, classified management personnel, and district administrators.

Elk Grove Unified School District Staff – 2004-05 School Year[11]	
Employee Category	**Full Time Equivalents**
Certificated Personnel	3,076
Classified Employees	1,157
Office and Site Administrators	189
Total Staff	**4,422**

From 1999 to 2002, Elk Grove Unified Staff grew by approximately 6.1 percent per year, which tracks closely with the 5.2 percent growth in student enrollment over the same time period. With student enrollment expected to grow by 5.5 percent per year until 2010, District staffing can be expected to experience commensurate growth, reaching an estimated total of 6,100 by 2010.

3.5 FACILITIES – CURRENT AND FUTURE

The Elk Grove Unified School District currently operates 50 schools from elementary schools to adult schools. To support these schools, the District operates 4 support facilities to accommodate administration, maintenance and operations, purchasing and warehousing, police services, food services, and transportation. An inventory of school site facilities is included in Appendix E. Support facilities include the Robert L. Trigg Education Center (administration), Education Center/Adult Education Annex, Student Support Center (maintenance and operations, purchasing and warehousing,

Elk Grove Unified School District 2004-05 Facility Inventory[12, 13]	
Facility Type	**Number in District**
Elementary Schools	34
Middle Schools	6
High Schools	9
Adult School	1
Support Facilities	4
Total Facilities	54

[11] Elk Grove Unified School District, Fingertip Facts, http://www.egusd.k12.ca.us/district/budgetfact.htm.
[12] Elk Grove Unified School District, Fingertip Facts, http://www.egusd.k12.ca.us/district/budgetfact.htm.
[13] Compass Maps, Inc., Map of the Elk Grove Unified School District and Vicinity, Edition of 2004.

police services, food services, and transportation), and the Maintenance and Operations Annex.

During the 2004-05 school year, nearly 5,100 permits for new housing units within the Elk Grove Unified School District were issued by cities and the county. These new housing units have fueled the growth of enrollment in the District. Elk Grove Unified School District has responded to the dramatic increases in enrollment by bussing students to under-utilized elementary schools, by utilizing a year-round schedule at some schools, and by building new schools. The goal of the District is to accommodate growth and to return middle schools to a traditional school year schedule. This will be accomplished through an aggressive new school construction program and periodic realignment of attendance boundaries.[14]

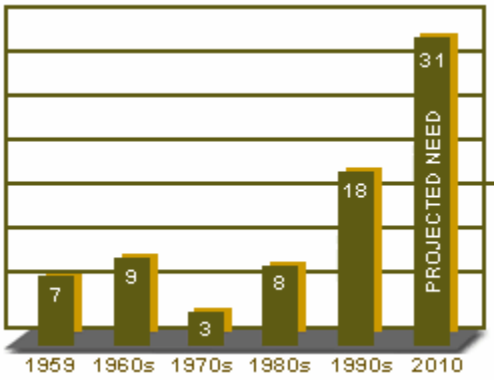

Figure 5 - New Schools Required

The new school construction program calls for the addition of 31 schools by 2010, including the 4 schools opened in the 2004-05 school year. Constructing 27 additional schools 2010 requires an average of 4 to 5 new schools be completed each year.

3.6 MUNICIPAL SEPARATE STORM SYSTEM

The Elk Grove Unified School District operates drainage systems at each of its facilities. Most of these drainage systems were designed primarily to remove runoff from the facility and to protect the facility from flooding. These systems discharge to the local municipal storm drain system or in a few instances, directly to receiving waters. The drainage systems at District facilities include surface conveyances (e.g., ditches, swales, gutters) and subsurface conveyances (e.g., pipes, culverts, etc.), along with ancillary facilities (e.g., grates, inlets, etc.). A few new schools have drainage systems that include water quality protection and enhancement facilities (e.g., detention basins, retention basins, swales, etc.) which were incorporated as a result of the NPDES program.

The drainage system at each site is generally maintained by on-site custodial staff and by grounds staff when they are on site. Maintenance includes removal of trash and debris and dealing with minor stoppages. Maintenance that is more significant is performed by operations and maintenance personnel on an as-needed basis. The operation and maintenance details for the newer water quality features of drainage systems are expected to be along the same lines as for the traditional drainage facilities.

During development of the Illicit Discharge Detection and Elimination element of this SWMP, the District will identify the schematic drainage system, drainage system

[14] Elk Grove Unified School District, Dramatic Growth in EGUSD, http://www.egusd.k12.ca.us/parents/growthfaq.htm.

discharge points, and receiving waters for each District facility. The District will also develop an operation and maintenance plan for its storm drainage and water quality protection and enhancement facilities.

3.6.1 CLIMATE

The climate in the Elk Grove Unified School District is typical of the California Central Valley. Temperatures range from average winter lows in January of 39 °F to average summer highs in July of 92 °F. Winter lows frequently plunge into the twenties, with a record low of 20 °F recorded in 1950. Summer highs frequently top the one hundred mark, with a record high of 115 °F recorded in 1961.

The southern Sacramento County area averages 19.2 inches of precipitation per year delivered over an average of 57 rainy days. The area has an identifiable "rainy season," highlighted in blue in the table below, which runs from October to May. During this rainy season, approximately 96% of the annual average rainfall is delivered over an average of 55 rainy days.

In summary, the winters in the District are cool and wet, and the summers are warm and dry. This weather provides for year round outdoor activities, including construction activities with seasonally appropriate water quality protection measures in place.

Elk Grove Unified School District
Summary Weather Data

Month	Temperature[15]			Precipitation[16]	
	Avg. Low °F	Mean °F	Avg. High °F	Avg. Depth Inches	Rainy Days Number
January	39	46	54	4.0	10
February	42	51	61	3.7	9
March	44	54	65	3.0	9
April	46	59	71	1.1	5
May	51	65	80	0.6	3
June	56	72	87	0.2	1
July	53	75	92	0.1	0
August	58	75	91	0.1	0
September	56	72	88	0.4	1
October	51	64	78	1.0	3
November	43	53	64	2.4	7
December	38	46	54	2.6	9

[15] The Weather Channel, Monthly Climatology, http://www.weather.com/activities/other/other/weather/climo-monthly.html?locid=95624.

[16] City-Date, Normal Climate Around Elk Grove, California, http://www.city-data.com/city/Elk-Grove-California.html.

3.6.2 RECEIVING WATERS

The Elk Grove Unified School District is generally bounded on the north by the American River, on the south by the Cosumnes and Mokelumne Rivers, and on the west by the Sacramento River, all referred to in the Basin Plan as principal streams.[17] The interior is drained by numerous smaller creeks, streams, and sloughs. Drainage in the District is generally from the east to the west, down slope from the western slope of the Sierra Nevada Mountains towards the Pacific Ocean to the west.

The American River and some of the numerous smaller creeks, streams, and sloughs are tributary to the Sacramento River. The Cosumnes and Mokelumne Rivers and the remaining numerous smaller creeks, streams, and sloughs are tributary to the San Joaquin River. The Sacramento River and San Joaquin River are both in turn tributary to the delta, Suisun Bay, San Pablo Bay, San Francisco Bay, and the Pacific Ocean.

Within the District, there are a number of lakes and other surface water impoundments.

Collectively, when urban runoff from District facilities reaches these waters or downstream waters, said waters become direct or indirect "receiving waters" for the District.

An important element of the SWMP will be the development of the Illicit Discharge Detection and Elimination control measure. As part of this control measure, the District will identify the drainage system discharge points for each of its facilities. Once these discharge points are identified, the receiving waters for each facility can be identified.

[17] The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region Fourth Edition – 1998.

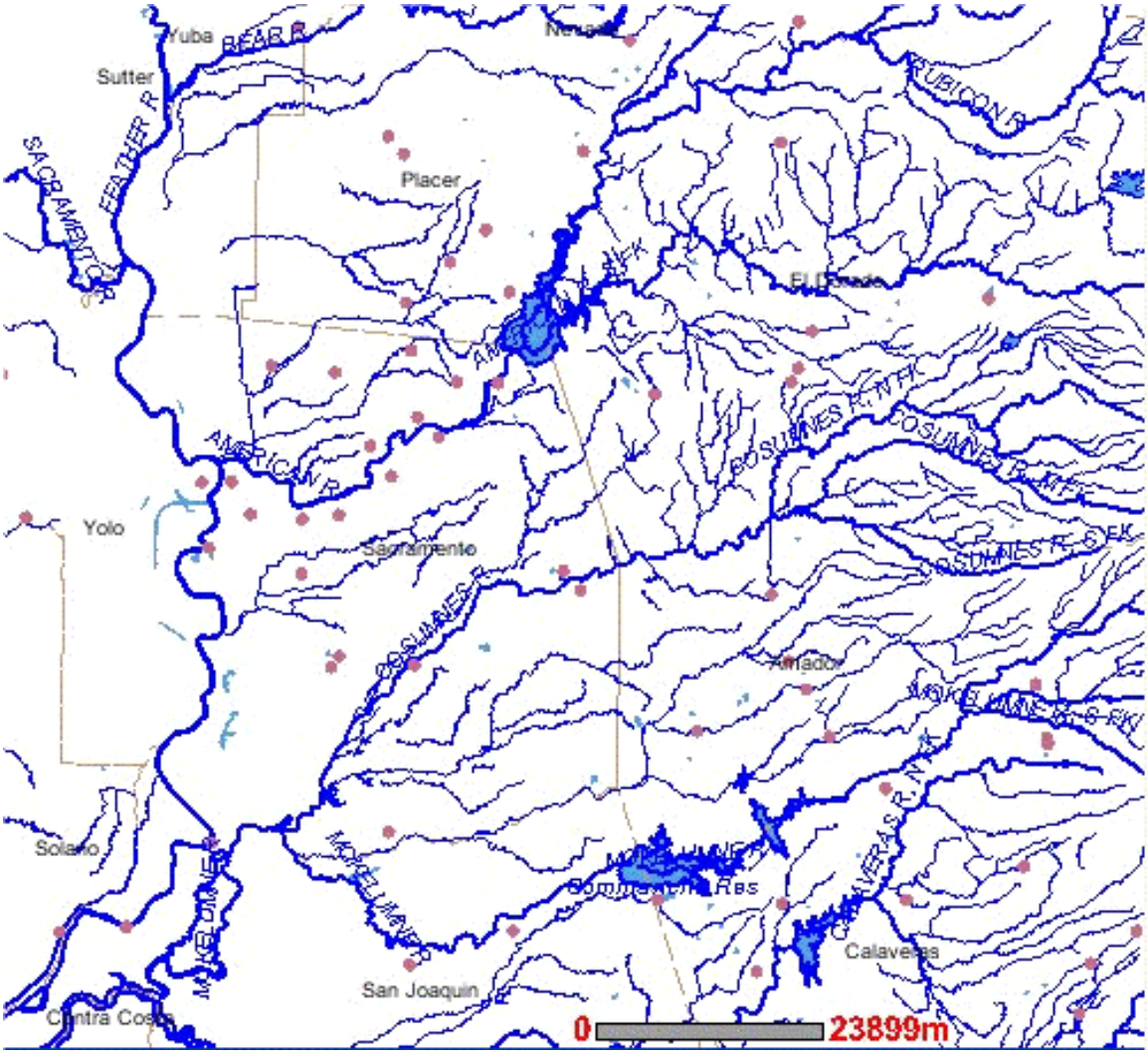

Figure 6 - Receiving Waters and Nearby Waters

4 SWMP CONTROL MEASURES

4.1 PROGRAM MANAGEMENT

4.1.1 GENERAL REQUIREMENTS

The Elk Grove Unified School District will designate a team of staff to oversee and manage the development and implementation of the District's Storm Water Management Program.

4.1.2 PERMIT REQUIREMENT

The General Small MS4 Permit does not include specific requirements for program management. The District has elected to include the Program Management control measure to set forth the District's intentions to effectively manage the development and implementation of the Storm Water Management Program.

4.1.3 RESPONSIBLE INDIVIDUAL

Constantine Baranoff
Associate Superintendent
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

4.1.4 COMMITMENTS

The Elk Grove Unified School District commits to the following items as part of this control measure:

A. Naming, and renaming when necessary, a District Storm Water Program Manager to be responsible for the coordination, development, and implementation of the District's Storm Water Management Program. The District Storm Water Program Manager will also serve as the District's liaison with the California Regional Water Quality Control Board Central Valley Region. The District Storm Water Program Manager will be responsible for coordination of actions and responses to municipal enforcement actions directed to the District. The CVRWQCB and municipal MS4 permittees within the District's boundaries will be provided with the Program Manager's contact information and notified that the Program Manger is the person to contact regarding enforcement actions related to District facilities or activities.
B. Designating, and redesignating when necessary, members of the District's Storm Water Program Management Team. At a minimum, the Storm Water Management Team will include the individuals designated as responsible for one or more of the control measures set forth in this Storm Water Management Program.
C. Conducting Storm Water Management Team meetings as needed to effectively manage the Storm Water Management Program.
D. Meeting annually with managers of City and County storm water management programs that underlie the District's boundaries to exchange program information

and to identify opportunities for coordinating the respective storm water management programs.

4.1.5 DEVELOPMENT GUIDANCE

General guidance for developing a system to manage the District's Storm Water Management Program is available in the Model Urban Runoff Program prepared by the City of Monterey, California. Because school districts are just now being designated for coverage under the Phase II program, there is little specific guidance available specific to school districts. The California Coalition for Adequate School Housing (C.A.S.H.) is beginning to develop some valuable resources, and may post additional resources as more schools are designated for coverage under the General Small MS4 Permit. Appendix H of this SWMP provides resource materials related to the Program Management control measure.

The Sacramento Stormwater Quality Partnership (SSQP) is composed of Sacramento area public agencies, including the County of Sacramento and the Cities of Sacramento, Citrus Heights, Elk Grove, Folsom, Galt, and Rancho Cordova. The goals of the SSQP are to:

- Educate and inform the public about urban runoff pollution
- Encourage public participation in community and clean-up events
- Work with industries and businesses to encourage pollution prevention
- Require construction activities to reduce erosion and pollution
- Require developing projects to include pollution controls that will continue to operate after construction is complete

The SSQP has developed many resources related to storm water quality management, and provides a communication forum on issues facing area MS4 system operators. The District will coordinate with the SSQP, and will evaluate the potential for a future formal or informal relationship with the organization consistent with the District's educational mission and Storm Water Management Program.

4.1.6 MEASURABLE GOALS

The Elk Grove Unified School District commits to the following measurable goals as part of this control measure.

A. Maintain a named District Storm Water Program Manager and report the manager's contact information in the Storm Water Management Program Annual Report. Provide the CRWQCBCV and municipal MS4 permittees within the District's boundaries with the District's Storm Water Program Manager's contact information and notify these agencies that the Program Manager is the District's contact for addressing municipal enforcement actions.
B. Maintain a District Storm Water Program Management Team and report the team members' contact information in the Storm Water Management Program Annual Report.
C. Conducting a minimum of two District Storm Water Management Team meetings per year.

D. Meet a minimum of once per year with the SSQP or representatives MS4 permittees within the District'

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of this control measure. Additional information on program assessment is included in Section 6.

4.1.7 IMPLEMENTATION SCHEDULE

The implementation schedule for this control measure is included in Section 5.

4.2 PUBLIC EDUCATION

4.2.1 GENERAL REQUIREMENT

The Elk Grove Unified School District must develop and implement a program to educate students and staff about the importance of the storm water program and the role of students and staff in the program.

4.2.2 PERMIT REQUIREMENT

The General Small MS4 Permit Section D.2.a sets forth the following requirements for the Public Education control measure.

a. Public Education and Outreach on Storm Water Impacts

The Permittee must implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff. For non-traditional Permittees, the employee/user population may serve as "the public" to target for outreach and involvement.

Non-traditional Small MS4s that discharge into medium and large MS4 may integrate public education and outreach program with the existing MS4 public education and outreach programs.

4.2.3 RESPONSIBLE INDIVIDUAL

Cindy Tucker - Director of Curriculum and Professional Learning
David Yoshihara - Director of Instructional Support
Curriculum and Professional Learning
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

4.2.4 COMMITMENTS

The Elk Grove Unified School District commits to the following items as part of this control measure:

A. Identifying opportunities to integrate storm water management education into the elementary school curriculum.

B. Developing or adopting a curriculum and lesson plan to educate students at the elementary school level about the importance of storm water management.
C. Implementing a classroom program to educate students at the elementary school level about the importance of storm water management.
D. Conducting a storm water management poster design competition.
E. Conducting a storm drain stencil design competition. The winning design, with appropriate modifications, will be utilized as part of the Illicit Discharge Detection and Elimination control measure.
F. Developing and implementing a student organization fundraiser policy that addresses pollution prevention, requires compliance with the District's SWMP for activities at District facilities, requires compliance with the local MS4 system operator's pollution prevention codes and programs for activities at non-District facilities, and compliance with State and Federal regulations.
G. Developing guidance to educate student organization car wash organizers on how to prevent the discharge of pollutants during car wash fundraisers.
H. Identifying opportunities to educate staff about the importance of storm water management.
I. Developing or adopting resource materials to educate staff about the importance of storm water management. Educational materials will include information on the hazards associated with illegal discharges and improper disposal of waste as part of the educational requirements under the Illicit Discharge Detection and Elimination control measure.
J. Implementing a program to educate staff about the importance of storm water management.

4.2.5 DEVELOPMENT GUIDANCE

There is generally ample guidance available for implementing a public education program; however, much of this guidance is geared towards a very broad audience. For Elk Grove Unified School District, the General Small MS4 Permit allows the District to target its students and staff for public education and outreach, as opposed to the public at large. Therefore, when using the available guidance materials, the District will need to consider adaptation appropriate for delivering the storm water message to students and staff. Appendix I of this SWMP provides resource materials related to the Public Education control measure.

4.2.6 MEASURABLE GOALS

The Elk Grove Unified School District commits to the following measurable goals as part of this control measure.

A. Identify one opportunity to integrate storm water management education into the elementary school curriculum at one grade level.
B. Develop or adopt a curriculum and lesson plan to educate students about storm water management at one grade level.
C. Implement a classroom program to educate students at one grade level about storm water management. Reach at least 75 percent of classrooms at the target grade level with at least 50 minutes of instruction each year.
D. Conduct a storm water management poster design contest annually.

E. Conduct a storm drain stencil design contest.
F. Develop and implement a student organization fundraiser policy that addresses pollution prevention and requires compliance with the District SWMP, local MS4 codes and programs, and State and Federal regulations.
G. Develop guidance to educate student organizations car wash organizers on how to prevent the discharge of pollutants during car wash fundraisers.
H. Identify one opportunity each year to educate staff about the importance of storm water management.
I. Develop or adopt resource materials to educate staff about the importance of storm water management.
J. Implement staff education about the importance of storm water management. Reach at least 75 percent of all staff with at least one storm water management educational message each year.

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of this control measure. Additional information on program assessment is included in Section 6.

4.2.7 IMPLEMENTATION SCHEDULE

The implementation schedule for this control measure is included in Section 5.

4.3 PUBLIC INVOLVEMENT/PARTICIPATION

4.3.1 GENERAL REQUIREMENT

The Elk Grove Unified School District must comply with State and local public notice requirements when implementing a public involvement/participation program.

4.3.2 PERMIT REQUIREMENT

The General Small MS4 Permit Section D.2.b sets forth the following requirements for the Public Participation control measure.

b. Public Involvement/Participation
The Permittee must at a minimum comply with State and local public notice requirements when implementing a public involvement/participation program.

4.3.3 RESPONSIBLE INDIVIDUAL

Steven M. Ladd, Ed.D.
Superintendent
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

4.3.4 COMMITMENTS

The Elk Grove Unified School District commits to the following items as part of this control measure:

A. Posting a notice on the District's web site notifying the public that the Storm Water Management Program is available for review.

B. Posting a notice on the District's web site notifying the public that the Storm Water Management Program Annual Report is available for review.
C. Posting on the District's web site the contact information for the District's Storm Water Program Manager.

4.3.5 DEVELOPMENT GUIDANCE

The General Small MS4 Permit requires that the District comply with State and local notice requirements when implementing Storm Water Management Program. The District will consult its legal counsel to determine the specific requirements for public notice relative to the Storm Water Management Program.

The Storm Water Management Program submitted to the California Regional Water Quality Control Board Central Valley Region will be posted on the Regional Board's web site to allow the public an opportunity to provide comments on the program. This 60 day public review period is a requirement of the General Small MS4 Permit and itself should fulfill at least a portion of the public participation requirements.

The Elk Grove Unified School District is already using its own extensive web site to communicate with the public about District-related matters, and will continue to use this modern and effective tool to communicate with and involve the public in the District's Storm Water Management Program. By utilizing the web site as the communication portal, the District will potentially reach a much wider audience of interested parties than the "public" defined in the General Small MS4 Permit for non-traditional small MS4s (Provision D.2.a).There are numerous resources for developing web-based content: Appendices H-O provide examples of web-based informational sites designed to involve the public in the storm water program.

The public involvement/participation and public education control measures share many similar resource materials as well as General Small MS4 Permit provisions that allow the District to focus its public involvement and participation efforts on the District's students and staff, as long as the District complies with State and local public notice requirements. Appendix J provides resource documents for public participation in the storm water management program: similar public education resources are also provided in the same appendix to help highlight the subtle but important differences between the two control measures.

4.3.6 MEASURABLE GOALS

The Elk Grove Unified School District commits to the following measurable goals as part of this control measure.

A. Post a notice on the District's web site notifying the public that the Storm Water Management Program is available for review. The first posting will be made within 60 days of the effective date of permit coverage and the document will be available for review during District office hours.
B. Post a notice on the District's web site notifying the public that that Storm Water Management Program Annual Report is available for review. The notice will be posted within 60 days following submittal of the Annual Report to the California

Regional Water Quality Control Board Central Valley Region and the document will be available for review during District office hours.

C. Posting on the District's web site the contact information for the District's Storm Water Program Manager. The posting will be made within 60 days following the effective date of permit coverage.

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of this control measure. Additional information on program assessment is included in Section 6.

4.3.7 IMPLEMENTATION SCHEDULE

The implementation schedule for this control measure is included in Section 5.

4.4 ILLICIT DISCHARGE DETECTION AND ELIMINATION

4.4.1 GENERAL REQUIREMENT

The Elk Grove Unified School District must develop, implement, and enforce a program to detect and eliminate illicit discharges, and to detect and address non-storm water discharges (including illegal dumping), into its MS4 system. As part of this program, the District must develop a map of its MS4 system showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from MS4. The District must also develop a program to educate students and staff about the hazards associated with illegal discharges and improper disposal of waste.

4.4.2 PERMIT REQUIREMENT

The General Small MS4 Permit Section D.2.c sets forth the following requirements for the Illicit Discharge Detection and Elimination control measure.

c. Illicit Discharge Detection and Elimination

The Permittee must:

1) Develop, implement, and enforce a program to detect and eliminate illicit discharges (as defined at 40 CFR §122.26(b)(2)) into the regulated Small MS4;

2) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from those outfalls;

3) To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions;

4) Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit;

5) Inform public employees, businesses, and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste; and

6) *Address the following categories of non-storm water discharges or flows (i.e., authorized non-storm water discharges) only where they are identified as significant contributors of pollutants to the Small MS4:*
    1. *water line flushing;*
    2. *landscape irrigation;*
    3. *diverted stream flows;*
    4. *rising ground waters;*
    5. *uncontaminated ground water infiltration (as defined at 40 CFR §35.2005(20)) to separate storm sewers;*
    6. *uncontaminated pumped ground water;*
    7. *discharges from potable water sources;*
    8. *foundation drains;*
    9. *air conditioning condensation;*
    10. *irrigation water;*
    11. *springs;*
    12. *water from crawl space pumps;*
    13. *footing drains;*
    14. *lawn watering;*
    15. *individual residential car washing;*
    16. *flows from riparian habitats and wetlands; and*
    17. *dechlorinated swimming pool discharges.*

    Discharges or flows from fire fighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants to waters of the U.S.

    If a RWQCB Executive Officer determines that any individual or class of non-storm water discharge(s) listed above may be a significant source of pollutants to waters of the U.S. or physically interconnected MS4, or poses a threat to water quality standards (beneficial uses), the RWQCB Executive Officer may require the appropriate Permittee(s) to monitor and submit a report and to implement BMPs on the discharge.

4.4.3 RESPONSIBLE INDIVIDUAL

Bill Stevens, Director
Maintenance and Grounds
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

4.4.4 COMMITMENTS

The Elk Grove Unified School District commits to the following items as part of this control measure:

A. Completing a storm drain system inventory at each District facility. The storm drain system inventory will include a map showing the location where the

District's MS4 discharges to another MS4 or directly to receiving waters. The storm drain system inventory will include the name of the local receiving MS4 (if applicable) and the name of the receiving waters.

B. Developing a plan to detect and eliminate illicit discharges and illegal dumping to the District's MS4. At a minimum, the plan will identify a mechanism by which students, staff, and others can report illicit discharges and illegal dumping.
C. Implementing the plan to detect and eliminate illicit discharges and illegal dumping to the District's MS4. At a minimum, the plan will include a mechanism by which students, staff, and others can report illicit discharges and illegal dumping.
D. Developing a plan to detect and address non-storm water discharges to the District's MS4 from District facilities and from off-site. At a minimum, the plan will include a policy or rule that prohibits non-storm water discharges to the storm drainage system. Develop a plan with District Human Resources for administrative and/or enforcement actions to address staff that fail to comply with the policy
E. Implementing the plan to detect and address non-storm water discharges to the District's MS4 from District facilities and from off site. At a minimum, a policy or rule that prohibits non-storm water discharges to the storm drain will be implemented. Education regarding the policy or rule will be incorporated into the Public Education element of the District's Storm Water Management Program.
F. Conducting inspections of District facilities to detect illicit discharges and non-storm water discharges.

4.4.5 DEVELOPMENT GUIDANCE

Illicit discharge detection and elimination has been an important part of municipal and industrial storm water programs for many years, and there is an abundance of guidance materials available to guide the District in developing their program. The available guidance that targets industrial and commercial sites should be useful for the District, since schools and school support facilities share a few common attributes with commercial and industrial facilities. Common attributes include sites that connect on-site "private" storm drains to the local municipal storm drain system (usually operated by the city, the county, or a drainage district), and support facilities with maintenance activities, equipment storage/maintenance, and materials/waste storage.

The California Storm Water Quality Association's, California Best Management Practice Handbook – Industrial-Commercial (CASQA, January 2003) should prove to be a helpful reference for the District. The recently released document, Illicit Discharge Control Detection and Elimination (Center for Watershed Protection, October 2004), is quite comprehensive, but appears to be geared towards small cities and counties that operate storm drain systems that receive discharges from many sources.

Appendix K provides resource materials for assisting in the development of this control measure.

4.4.6 MEASURABLE GOALS

The Elk Grove Unified School District commits to the following measurable goals as part of this control measure.

A. Prepare a facility plan for each District facility. Complete the development of site plans over a two year period, with one half the site plans completed the first year and all remaining sites plans completed the following year.
B. Develop a plan to detect and eliminate illicit discharges and illegal dumping to the District's MS4.
C. Implement the plan to detect and eliminate illicit discharges and illegal dumping to the District's MS4.
D. Develop a plan to detect and address non-storm water discharges to the District's MS4 from District facilities and from off site.
E. Implement the plan to detect and address non-storm water discharges to the District's MS4 from District facilities and from off site.
F. Inspect District facilities to detect illicit discharges and non-storm water discharges.

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of the control measure. Additional information on program assessment is included in Section 6.

4.4.7 IMPLEMENTATION SCHEDULE

The implementation schedule for this control measure is included in Section 5.

4.5 CONSTRUCTION SITE STORM WATER MANAGEMENT

4.5.1 GENERAL REQUIREMENT

The Elk Grove Unified School District is responsible for school and ancillary facility construction projects that are subject to the General Construction Permit. Since a storm water discharge can only be covered by one NPDES permit, and because the CRWQCBCV has rejected the District's proposal to bring its construction site discharges under the Small MS4 permit, the District's Storm Water Management Program specifically excludes coverage of any discharge which is covered by the General Construction Permit.

The Elk Grove Unified School District must develop and implement a program to ensure that its construction projects subject to the General Permit comply with said permit. The program must include procedures to gain General Permit coverage when required, inspections of sites to verify compliance, and sanctions in cases of noncompliance with provisions of the General Permit.

4.5.2 PERMIT REQUIREMENT

The General Small MS4 Permit includes requirements for a construction program which are similar, but less extensive, than requirements included in the General Construction

Permit. The District will approach this program in two ways: management of the District's construction site storm water program will be covered by this Storm Water Management Program while construction site storm water discharges will continue to be covered by the General Permit. A copy of the General Construction Permit is included in Appendix F.

The General Small MS4 Permit Section D.2.d sets forth the following requirements for the Construction Site Storm Water Management control measure.

d. Construction Site Storm Water Runoff Control

The Permittee must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the Small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include the development and implementation of, at a minimum:

1) *An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions, or other effective mechanisms, to ensure compliance, to the extent allowable under State, or local law;*
2) *Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;*
3) *Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;*
4) *Procedures for site plan review which incorporate consideration of potential water quality impacts;*
5) *Procedures for receipt and consideration of information submitted by the public; and*
6) *Procedures for site inspection and enforcement of control measures.*

4.5.3 RESPONSIBLE INDIVIDUAL

Constantine Baranoff, Associate Superintendent
Facilities and Planning
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

4.5.4 COMMITMENTS

The Elk Grove Unified School District commits to the following items as part of this control measure:

A. Updating the District's construction specifications to include detailed specifications for the preparation and implementation of a Storm Water Pollution Prevention Plan by the construction contractor at all sites otherwise subject to the General Construction Permit. At a minimum, the specifications will require

compliance with all applicable requirements of the General Construction Permit for preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), including erosion control, sediment control, and waste control (including discarded building materials, concrete washout, chemicals, litter, and sanitary waste), and use of a District approved procedure or checklist for contractor inspections. This specification will be updated within 180 days following adoption of a successor General Construction Permit.

B. Implementing the updated District construction specifications for preparation and implementation of a SWPPP by incorporating the specification in bid documents.
C. Developing a process for review and approval of SWPPPs prior to start of construction activities subject to the General Construction Permit. Have the Board or Superintendent designate in writing a person authorized to sign SWPPPs on behalf of the District.
D. Implementing the SWPPP review and approval process.
E. Developing a SWPPP implementation verification program which includes a process for non-rainy season, pre-rainy season, and rainy season inspections by qualified inspectors. The program will include development of inspections procedures or checklists for use by inspectors.
F. Implementing the SWPPP implementation verification program at District construction sites subject to the General Construction Permit requirements.
G. Training District construction program staff at least once per year. Training will be tailored to the needs of the attendees, but will generally include coverage of topics such as SWPPP reviews, SWPPP implementation inspections, SWPPP record keeping, erosion control BMPs, sediment control BMPs, and other construction site BMPs. Training will cover how to notify the Storm Water Program Manger and to appropriately respond to municipal enforcement actions issued to the District. Staff to be trained includes senior construction managers, construction managers, resident site staff, and inspection staff.

4.5.5 DEVELOPMENT GUIDANCE

There are numerous resource materials available to assist the District in the development of the construction site storm water pollution prevention program. Notable general construction site guidance and a Storm Water Pollution Prevention Plan (SWPPP) template are available from the California Storm Water Quality Association's publication, California Storm Water Best Management Practice Handbook – Construction (CASQA, January 2003). The CASQA handbook will provide a reliable and practical reference document for both District staff and construction contractors. The California Department of Transportation's documents, Caltrans Storm Water Quality Handbooks, provide guidance on the use of the Caltrans special provisions for water pollution control. These special provisions require the construction contractor to prepare and to implement a SWPPP. The Caltrans special provisions should prove to be adaptable to District construction projects if careful attention to the differences between linear highway construction projects and school site construction projects are heeded.

The District recognizes the importance of a site-specific SWPPP for construction sites due to the wide range of site conditions expected at District construction sites and due to

the many variables in construction practices introduced by construction contractors. Rather than spend significant resources to develop a construction BMP handbook specific to the District, the District will focus its resources on developing understandable, biddable, and enforceable specifications for water pollution control at District construction sites. These specifications will utilize appropriate materials contained within the commendable resources already assembled and maintained by organizations such as CASQA and Caltrans. Together with the proposed SWPPP review and approval process, and the SWPPP implementation verification process, the District is confident that its sites will remain compliant with the General Construction Permit.

Appendix L provides resource materials for assisting in the development of this control measure.

4.5.6 MEASURABLE GOALS

The Elk Grove Unified School District commits to the following measurable goals as part of this control measure.

A. Update the District's construction specification to include detailed specifications for preparation and implementation of SWPPPs and the conduct of inspections at sites subject to the General Construction Permit.
B. Implement the updated construction specification for preparation and implementation of a SWPPP and inspections of construction sites by incorporating it into 100% of bid packages released for bid more than 60 days following completion of the updated specification.
C. Develop and document a process for review and approval of SWPPPs and include reference to the Board's or Superintendent's designation of the person(s) authorized to sign SWPPPs on behalf of the District.
D. Implement the SWPPP review and approval process for 100% of new and updated SWPPPs prepared for District projects and submitted for approval within 60 days following development of the process. The District's approval of new and updated SWPPPs shall be indicated by the signature of the person(s) designated by the Board or the Superintendent to sign SWPPPs on behalf of the District.
E. Develop and document a process for verification of SWPPP implementation.
F. Implement the SWPPP implementation verification process for 100% of District sites that are active and that have a SWPPP being implemented as of 60 days following development of the verification process.
G. Train 75% District construction program staff at least once per year with 100% of staff receiving training at least once every two years. Construction program staff to be trained includes senior construction managers, construction managers, resident site staff, and inspection. Train new/transferred staff within 6 months of assignment to a construction position.

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of the control measure. Additional information on program assessment is included in Section 6.

4.5.7 IMPLEMENTATION SCHEDULE

The implementation schedule for this control measure is included in Section 5.

4.6 POST CONSTRUCTION STORM WATER MANAGEMENT

4.6.1 GENERAL REQUIREMENT

The Elk Grove Unified School District must develop and implement a program to incorporate BMPs that protect water quality and control runoff into new facilities and existing facilities that undergo significant redevelopment.

4.6.2 PERMIT REQUIREMENT

The General Small MS4 Permit Section D.2.e sets forth the following requirements for the Post Construction Storm Water Management control measure.

e. Post-Construction Storm Water Management in New Development and Redevelopment

The Permittee must:

1) Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the Small MS4 by ensuring that controls are in place that would prevent or minimize water quality impacts;

2) Develop and implement strategies, which include a combination of structural and/or non-structural BMPs appropriate for your community;

3) Use an ordinance or other regulatory mechanism to address postconstruction runoff from new development and redevelopment projects to the extent allowable under State or local law For those Small MS4s described in Supplemental Provision E below, the requirements must at least include the design standards contained in Attachment 4 of this General Permit or a functionally equivalent program that is acceptable to the appropriate RWQCB; and

4) Ensure adequate long-term operation and maintenance of BMPs.

The General Permit does not require redesign of K-12 school or community college facilities that have been submitted to the Department of General Services, Division of the State Architect before adoption of the permit, and which receive final approval from the State Allocation Board or the Public Works Board, as appropriate, on or before December 31, 2004.

4.6.3 RESPONSIBLE INDIVIDUALS

Facility Design

Constantine Baranoff, Associate Superintendent
Facilities and Planning
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

Facility Operation and Maintenance
Bill Stevens, Director
Maintenance and Grounds
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

4.6.4 COMMITMENTS

The Elk Grove Unified School District commits to the following items as part of this control measure:

A. Developing a program to prevent or minimize water quality impacts associated with new facilities or facilities that undergo significant redevelopment by addressing storm water runoff and incorporating BMPs. The program will address projects that disturb one acre or more, or less than one acre if part of a larger common plan of development. Facilities to be addressed include schools and ancillary facilities. The program will include strategies such incorporation of site design BMPs, source control BMPs, and treatment control BMPs.
B. Implementing the program to prevent or minimize water quality impacts associated by new facilities or facilities that undergo significant redevelopment by addressing storm water runoff and incorporating BMPs.
C. Developing a plan for operation and maintenance of post-construction BMPs.
D. Implementing the plan for operation and maintenance of post-construction BMPs.

4.6.5 DEVELOPMENT GUIDANCE

Post-construction storm water management requirements are relatively new to Phase I MS4 storm water programs, and therefore there are substantially fewer guidance documents available to assist Phase II communities who are being required to ramp this program up over the five year term of the General Small MS4 Permit. Because of the potentially high cost implications associated with this program (Regional Board staff have quoted up-front costs of 3 to 5% of construction costs), this program requires extra careful development. Fortunately, several organizations in California have developed guidance documents specific to new development. First, there is the Bay Area Storm Water Management Agencies Association (BASMAA) who published the series of documents referred to as "Start at the Source." The original Start at the Source document and the two follow-on companion documents provide excellent guidance on integrating storm water quality controls into development projects. The California Storm Water Quality Association's new document, California Storm Water Best Management Practice Handbook – New Development and Redevelopment (CASQA, 2003) provides a range of guidance for new development, with many of the concepts built around the concepts set forth in Start at the Source. The BASMAA and CASQA documents are essential references for the post-construction storm water management program.

Appendix M provides resource materials for assisting in the development of this control measure.

4.6.6 MEASURABLE GOALS

The Elk Grove Unified School District commits to the following measurable goals as part of this control measure.

A. Develop a program to prevent or minimize water quality impacts associated with new facilities or facilities that undergo significant redevelopment by addressing storm water runoff and incorporating BMPs.
B. Implement the program to prevent or minimize water quality impacts associated with new facilities or facilities that undergo significant redevelopment by addressing storm water runoff and incorporating BMPs. The program will be implemented for 100% of covered projects that have not been submitted to the Department of General Services, Division of the State Architect as of the date the program described above is completed. For projects scheduled for submittal to the Department of General Services, Division of the State Architect, within 60 days following program completion, the project shall endeavor to comply with feasible program requirements. Feasible program requirements include requirements that will not require significant redesign of the project: the engineer and/or architect will document the reasons any requirement is determined to not be feasible.
C. Develop a plan for operation and maintenance of post-construction BMPs.
D. Implement the post-construction BMP operation and maintenance plan for post-construction BMPs implemented for water quality protection or improvement.

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of the control measure. Additional information on program assessment is included in Section 6.

4.6.7 IMPLEMENTATION SCHEDULE

The implementation schedule for this control measure is included in Section 5.

4.7 POLLUTION PREVENTION AND GOOD HOUSEKEEPING

4.7.1 GENERAL REQUIREMENT

The Elk Grove Unified School District must develop and implement a program to prevent the discharge of pollutants from its own activities. The program must include training and educating staff on pollution prevention.

4.7.2 PERMIT REQUIREMENT

The General Small MS4 Permit Section D.2.f sets forth the following requirements for the Pollution Prevention and Good Housekeeping control measure.

f. Pollution Prevention/Good Housekeeping for Municipal Operations

The Permittee must:

1) Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and

2) *Using training materials that are available from U.S. EPA, the State, or other organizations, the program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet building maintenance, new construction and land disturbances, and storm water system maintenance.*

4.7.3 RESPONSIBLE INDIVIDUALS

Custodial Services
Linda Lopez, Supervisor
Custodial Services
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

Operations, Maintenance, and Grounds
Bill Stevens, Director
Maintenance and Grounds
Elk Grove Unified School District
9510 Elk Grove-Florin Road
Elk Grove, CA 95624

Transportation
Claudia Sherrill, Director
Transportation
8421 Gerber Road
Sacramento, CA 95828

4.7.4 COMMITMENTS

The Elk Grove Unified School District commits to the following items as part of this control measure:

A. Developing guidance for pollution prevention and good housekeeping during operation and maintenance activities at District schools and ancillary facilities. At a minimum, the guidance will cover dumpster area management, can washing, pressure washing, and non-storm water discharges.
B. Developing a program to train District operation and maintenance staff on implementing the guidance for pollution prevention and good housekeeping during operation and maintenance activities at District schools and ancillary facilities.
C. Training District operation and maintenance staff annually on how to implement pollution prevention and good housekeeping during operation and maintenance District schools and ancillary facilities.
D. Implementing pollution prevention and good housekeeping during operation and maintenance activities.
E. Performing spot checks at schools and ancillary facilities to verify that pollution prevention and good housekeeping practices are being appropriately implemented.

For the purposes of this control measure, operation and maintenance staff include all staff that operate, maintain, or care for District school facilities, ancillary facilities, and equipment. This includes custodial staff, building maintenance staff, fleet maintenance staff, equipment operators, and grounds maintenance staff. This does not include bus drivers or administrative support staff (e.g., receptionist, secretary, clerk, etc.).

4.7.5 DEVELOPMENT GUIDANCE

Pollution prevention and good housekeeping are control measures that will affect a wide range of District staff, from custodial staff at individual schools, to fleet maintenance staff at the Student Support Center, to grounds staff that work at multiple school sites, and to food services staff that work in the District kitchen or in school cafeterias. This program will also require a significant amount of effort to coordinate staff training and to develop alternatives to some existing housekeeping practices.

Fortunately, there are many good sources of information available to assist the District in developing this program. The District should largely be able to identify and adapt existing materials to the needs of the District. A good starting point for developing this program is the California Storm Water Quality Association's, California Storm Water Best Management Practice Handbooks. CASQA's Municipal Handbook and the Industrial and Commercial Handbook are directly applicable to the District's program and will prove to be valuable resources for materials that can be used as-is or easily adapted to the specific needs of the District.

Appendix N provides resource materials for assisting in the development of this control measure.

4.7.6 MEASURABLE GOALS

The Elk Grove Unified School District commits to the following measurable goals as part of this control measure.

A. Develop guidance for pollution prevention and good housekeeping during operation and maintenance activities at District schools and ancillary facilities.
B. Develop a program to train District operation and maintenance staff on implementing the guidance for pollution prevention and good housekeeping.
C. Train at least 75% of operations and maintenance staff annually, with 100% of staff trained every two years. Train new/transferred staff within 6 months of assignment to an operations and maintenance position.
D. Implement the pollution prevention and good housekeeping guidance during operation and maintenance activities.
E. Perform a spot check at 10% of District facilities to verify that pollution prevention and good housekeeping practices are being implemented. For spot checking, 10% of elementary schools, 10% of middle schools, 10% of high schools, and 10% of ancillary facilities will be randomly selected for a spot check each year. Where improvements are determined necessary, the results of the spot and suggested improvements will be provided to appropriate staff. A follow up spot check will then be conducted within 60 days to verify that suggested improvements have been implemented.

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of the control measure. Additional information on program assessment is included in Section 6.

4.7.7 IMPLEMENTATION SCHEDULE

The implementation schedule for this control measure is included in Section 5.

4.8 TRANSPORTATION FACILITY STORM WATER MANAGEMENT

4.8.1 GENERAL REQUIREMENT

The Elk Grove Unified School District operates transportation facilities that are subject to the General Industrial Permit. Since a storm water discharge can only be covered by one NPDES permit, the District's Storm Water Management Program specifically excludes coverage of any discharge which is covered by the General Industrial Permit. A copy of the General Industrial Permit is included in Appendix G.

The Elk Grove Unified School District will develop and implement a program to ensure that its facilities subject to the General Industrial Permit comply with said permit. The program will include procedures to maintain or to gain coverage under the General Industrial Permit when required, and inspections to verify compliance. At this time, the District's transportation facilities at the Student Support Center are the only facilities known to be covered by the General Industrial Permit: District facilities not covered by the General Industrial Permit will be subject to the provisions of this Storm Water Management Program, including Good Housekeeping measures and other applicable program elements.

4.8.2 PERMIT REQUIREMENT

The General Small MS4 Permit does not include specific requirements for an industrial storm water management program. Therefore, the District proposes to include all District facilities not subject to the General Industrial Permit under the provisions included in this Storm Water Management Program. The Storm Water Management Program will include the management of compliance efforts at District facilities subject to the General Industrial Permit, but the discharges from said facilities will continue to be covered under the General Industrial Permit. A copy of the General Industrial Permit is included in Appendix G.

4.8.3 RESPONSIBLE INDIVIDUAL

Claudia Sherrill
Director of Transportation
8421 Gerber Road
Sacramento, CA 95828

4.8.4 COMMITMENTS

The Elk Grove Unified School District commits to the following items as part of this control measure:

A. Continuing to comply with requirements of the General Industrial Permit including the requirement to maintain a Storm Water Pollution Prevention Plan to address the District's transportation facilities at the Student Support Center. The District will continue to comply with the requirements of the General Industrial Permit and its successors.
B. Updating and amending the Industrial SWPPP to include only those facilities otherwise subject to the General Industrial Permit.
C. Continuing to participate in the School Insurance Authority Industrial SWPPP support program including monitoring and participation in training programs.
D. Updating the Transportation Facility SWPPP within 180 days of a successor General Industrial Permit being issued.

4.8.5 DEVELOPMENT GUIDANCE

The California Storm Water Quality Associations, California Best Management Practice Handbook – Industrial and Commercial, is an excellent resource for District facilities subject to the General Industrial Permit. The Industrial and Commercial Handbook provides guidance on developing and implementing a Storm Water Pollution Prevention Plan (SWPPP), and provides guidance on numerous BMPs, including source control BMPs and treatment control BMPs. Appendix D of the Industrial and Commercial Handbook provides business guide sheets. Many of the business category guide sheets address business categories that parallel school district operations, and are therefore useful in helping the District develop this control measure for its industrial-like sites. For example, the Automotive Service – Maintenance Guide Sheet provides guidance that the District can use or adapt to its fleet maintenance operations.

Appendix O provides resource materials for assisting in the development of this control measure.

4.8.6 MEASURABLE GOALS

The Elk Grove Unified School District commits to the following measurable goals as part of this control measure.

A. Continue to comply with all requirements of the General Industrial Permit, including the requirement to maintain a Storm Water Pollution Prevention Plan to address the District's transportation facilities.
B. Update and amend the Industrial SWPPP to include only those facilities otherwise subject to the General Industrial Permit.
C. Continue to participate in the School Insurance Authority Industrial SWPPP support program including monitoring and participating in training programs.
D. Update the Transportation Facility SWPPP within 180 days of a successor General Industrial Permit being issued.

The measurable goals set forth in this section will be utilized to assess the progress and level of implementation of the control measure. Additional information on program assessment is included in Section 6.

4.8.7 IMPLEMENTATION SCHEDULE

The implementation schedule for this control measure is included in Section 5.

5 IMPLEMENTATION SCHEDULE

The schedule can be viewed by printing the schedule file.

6 SWMP ASSESSMENT

6.1 GENERAL

Significant staff and financial resources will be expended to implement the Elk Grove Unified School District Storm Water Management Program. To ensure that the resources expended on the program are achieving positive results, and that the District is complying with the terms of the General Small MS4 Permit, the Storm Water Management Program will be assessed on an annual basis. The results of this assessment will be reported to the California Regional Water Quality Control Board Central Valley Region in the program's Annual Report.

6.2 ASSESSMENT TECHNIQUES

Assessment techniques applicable to storm water manage program include ***direct methods*** and ***indirect methods***.

The ***direct method*** consists of establishing a water quality baseline, implementing the storm water management program, and then measuring changes in water quality that result from implementing the plan. The direct method is ideal in theory, however in practice, the high variability in the rainfall-runoff process results in an even greater variability in water quality: this variability makes it extremely difficult to establish both an accurate water quality baseline and changes in water quality as a result of program implementation. It takes years of data collection to establish the water quality baseline, and more years of data collection to show changes in water quality as a result of implementing a storm water management program.

The ***indirect method*** does not directly measure changes in water quality; rather, it infers changes in water quality based on implementing measures believed to have the ability to improve water quality when implemented. For example, parking lot sweeping is a BMP implemented by many municipal and industrial storm water management programs as a means of improving water quality. Using indirect methods, water quality improvement is inferred by verifying that parking lots are being swept at a rate believed to result in water quality improvement. The indirect method is commonly used by storm water program managers as it can yield immediate results. The drawback to this method is that it is sensitive to selection and implementation of appropriate BMPs, and that BMPs might be implemented for years only to later learn that the BMPs were not effective, or worse yet, were counter-effective for improving water quality.

The indirect method of program assessment is appropriate for the Elk Grove Unified School District and will be used for assessing the Storm Water Management Program.

6.3 MEASURABLE GOALS

The Elk Grove Unified School District Storm Water Management Program consists of eight control measures (See Section 4) that collectively are believed to encompass a program that will reduce pollutants in storm water to the maximum extent practicable

(MEP). For each of the eight control measures, measurable goals have been established. The Storm Water Management Program will be deemed to be effective when progress towards achieving the measurable goals is being made.

Some measurable goals only need to be achieved once. For example, updating the specification requiring the contractor to prepare and to implement a SWPPP on a construction project is a one-time commitment. Other measurable goals need to be achieved on an on-going basis. For example, including the updated SWPPP specification in bid packages for construction projects is on-going, and will continue for the duration of the permit.

6.4 ANNUAL REPORT

Every year, an Annual Report will be prepared to document the past year's achievements and the next year's plans with respect to implementing the Storm Water Management Program. In accordance with the General Small MS4 Permit, the Annual Report will cover the reporting period (July 1 through June 30) and will include the following:

- The status of compliance with permit conditions.
- An assessment of the appropriateness and effectiveness of the identified BMPs.
- The status of achieving the measurable goals established for the eight control measures.
- The results of information collected and analyzed, including monitoring data, in any, during the reporting period.
- A summary of storm water activities planned for the next reporting year.
- Identification of any proposed changes to the SWMP along with a justification for why the changes are necessary.
- The names and contact information for the people responsible for implementing and coordinating the SWMP.

The Annual Report is due to the CRWQCBCV by September 15 each year.

6.5 RECORD KEEPING

In accordance with the General Small MS4 Permit, records required by the Permit will be maintained for at least five years or the duration of the General Small MS4 Permit if continued. The Executive Officer of the CRWQCBCV may specify a longer term for record retention.

In accordance with the General Small MS4 Permit, the Elk Grove Unified School District will submit records to the Executive Officer of the CRWQCBCV upon request. In addition, the District will make the General Small MS4 Permit, the Storm Water Management Program, and program records available to the public during regular business hours.

6.6 NON-COMPLIANCE REPORTING

In the unlikely event that the Elk Grove Unified School District cannot certify compliance or has had other instances of noncompliance, the District will notify the CRWQCBCV within 30 days. Instances of noncompliance resulting in emergencies (i.e., that endanger human health or the environment) will be reported orally to the CRWQCBCV within 24 hours from the time the District becomes aware of the circumstance, with a follow up written notification within five days of the occurrence. The notification will identify the noncompliance event and an initial assessment of any impact caused by the event, describe the actions necessary to achieve compliance, and include a time schedule indicating when compliance will be achieved. The District will begin immediately act on the corrective actions and time schedule submitted to the CRWQCBCV, and will modify the corrective actions and/or time schedule if ordered by the Executive Officer of the CRWQCBCV.

Appendix A – Designation Letter

Designation Letter from the California Regional Water Quality Control Board Central Valley Region

Appendix B – Notice of Intent

Notice of Intent to Comply with the terms of the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Water Quality Order No. 2003-0005-DWQ)

Appendix C – Waste Discharge Identification Number

Waste Discharge Identification Number Transmittal Letter from the State

[Insert When Received from the State]

Appendix D – General Small MS4 Permit

Water Quality Order No. 2003-0005-DWQ, National Pollutant Discharge Elimination System General Permit No. CAS000004, Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems

Appendix E – District Facility Site and Information Maps

District Facility Site Maps showing Facility Location, Schematic of the On-Site Drainage System, Drainage Discharge Locations, and Receiving Waters

Note: This information will be fully developed during the permit term. The Facility Site Maps included with the initial SWMP include information available at the time the SWMP was submitted.

Appendix F – General Construction Permit

Water Quality Order No. 99-08-DWQ, National Pollutant Discharge Elimination System, General Permit No. CAS000002, Waste Discharge Requirements for Discharges of Storm Water Associated with Construction Activity

Appendix G – General Industrial Permit

Water Quality Order No. 97-03-DWQ, National Pollutant Discharge Elimination System, General Permit No. CAS000001, Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities

Appendix H – Program Management Resource Materials

The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program. The resource materials are general in nature and are not specific to the District, and therefore cannot be interpreted to convey any specific commitment or content of the BMPs that will ultimately be developed and included in the Elk Grove Unified School District Storm Water Management Program. All commitments being made by the Elk Grove Unified School District with respect to the Storm Water Management Program are set forth in Sections 4-6 of the Storm Water Management Program. The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program.

Resources:

1. **Chapter 3 – Development of Urban Runoff Program**
   http://www.waterboards.ca.gov/stormwtr/docs/murp_chapter3.pdf

2. **C.A.S.H. Stormwater Website Resource Document**
   http://www.cashnet.org/resource-center/Section2/2-4-28-0504.pdf

Appendix I - Public Education Resource Materials

The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program. The resource materials are general in nature and are not specific to the District, and therefore cannot be interpreted to convey any specific commitment or content of the BMPs that will ultimately be developed and included in the Elk Grove Unified School District Storm Water Management Program. All commitments being made by the Elk Grove Unified School District with respect to the Storm Water Management Program are set forth in Sections 4-6 of the Storm Water Management Program.

Resources:

1. **Model Urban Runoff Program (City of Monterey, et al., 2002), Appendix 4D Educational Tools and Resources for Public Education Program. http://www.waterboards.ca.gov/stormwtr/docs/murp_appendix4d.pdf**
2. **School Oriented Fact Sheets from the Corona-Norco Unified School District Storm Water Management Program developed by AEI-CASC Engineering.**
3. **The American Ocean Campaign's web site has a number of educational items and curriculum aids developed specifically for school aged children (extensive resource, copies not included in this appendix). http://www.americanoceans.org/runoff/epa-bro1.htm#kids http://www.americanoceans.org/runoff/epa-curr.htm**
4. **The City of Sacramento Storm Water Program provides resources for teachers (extensive resource, copies not included in this appendix). http://www.sacstormwater.org/fun/teachers.htm**
5. **The California Stormwater Quality Association (CASQA) web site provides extensive resource materials for use in education programs. http://www.casqa.org/resourcelibrary/**

Appendix J - Public Involvement/Participation Resource Materials

The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program. The resource materials are general in nature and are not specific to the District, and therefore cannot be interpreted to convey any specific commitment or content of the BMPs that will ultimately be developed and included in the Elk Grove Unified School District Storm Water Management Program. All commitments being made by the Elk Grove Unified School District with respect to the Storm Water Management Program are set forth in Sections 4-6 of the Storm Water Management Program.

Resources:

1. **USEPA Public Participation/Involvement Minimum Control Measure Fact Sheet.**
   http://www.epa.gov/npdes/pubs/fact2-4.pdf
2. **USEAP Education and Outreach Minimum Control Measure Fact Sheet**
   http://www.epa.gov/npdes/pubs/fact2-3.pdf

Appendix K - Illicit Discharge Detection and Elimination Resource Materials

The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program. The resource materials are general in nature and are not specific to the District, and therefore cannot be interpreted to convey any specific commitment or content of the BMPs that will ultimately be developed and included in the Elk Grove Unified School District Storm Water Management Program. All commitments being made by the Elk Grove Unified School District with respect to the Storm Water Management Program are set forth in Sections 4-6 of the Storm Water Management Program.

Resources:

1. **School Oriented Fact Sheets from the Corona-Norco Unified School District Storm Water Management Program developed by AEI-CASC Engineering.**
2. **California Storm Water Quality Association, California Best Management Practice Handbook – Industrial Commercial – Section 2 describes the process for developing an industrial SWPPP: Phase I and Phase II of the five phase SWPPP development process provides a good discussion of how to evaluate sites for pollutant sources, including illicit discharges. http://www.cabmphandbooks.com/Documents/Industrial/Section_2.pdf**
3. **California Storm Water Quality Association, California Best Management Practice Handbook – Industrial Commercial – Business Category Guide Sheets provide guidance on potential pollutant sources at various types of facilities similar to facilities operated by the District. http://www.cabmphandbooks.com/Documents/Industrial/Appendix_D.pdf**

Appendix L – Construction Site Storm Water Management Resource Materials

The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program. The resource materials are general in nature and are not specific to the District, and therefore cannot be interpreted to convey any specific commitment or content of the BMPs that will ultimately be developed and included in the Elk Grove Unified School District Storm Water Management Program. All commitments being made by the Elk Grove Unified School District with respect to the Storm Water Management Program are set forth in Sections 4-6 of the Storm Water Management Program.

Resources:

1. **School Oriented Fact Sheets from the Corona-Norco Unified School District Storm Water Management Program developed by AEI-CASC Engineering.**
2. **California Storm Water Quality Association, California Best Management Practice Handbook – Construction, provides an extensive resource of information related to construction site storm water management (copies not included in this appendix). http://www.cabmphandbooks.com/Documents/Construction/Section_1.pdf**

Appendix M – Post Construction Storm Water Management Resource Materials

The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program. The resource materials are general in nature and are not specific to the District, and therefore cannot be interpreted to convey any specific commitment or content of the BMPs that will ultimately be developed and included in the Elk Grove Unified School District Storm Water Management Program. All commitments being made by the Elk Grove Unified School District with respect to the Storm Water Management Program are set forth in Sections 4-6 of the Storm Water Management Program.

Resources:

1. **School Oriented Fact Sheets from the Corona-Norco Unified School District Storm Water Management Program developed by AEI-CASC Engineering.**
2. **Model Urban Runoff (City of Monterey, et al., 2002), Appendix 4T Post Construction controls. http://www.waterboards.ca.gov/stormwtr/docs/murp_appendix4t.pdf**
3. **Using LID Techniques to Meet Development Standards for Stormwater Quality Control (Endicott, 2004).**
4. **California Storm Water Quality Association, California Best Management Practice Handbook – New Development and Redevelopment, provides an extensive resource of information related to incorporation of water quality controls into new and redevelopment projects (extensive document, copies not included in this appendix). http://www.cabmphandbooks.com/documents/Development/DevelopmentHandbook.pdf**

Appendix N – Pollution Prevention and Good Housekeeping Resource Materials

The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program. The resource materials are general in nature and are not specific to the District, and therefore cannot be interpreted to convey any specific commitment or content of the BMPs that will ultimately be developed and included in the Elk Grove Unified School District Storm Water Management Program. All commitments being made by the Elk Grove Unified School District with respect to the Storm Water Management Program are set forth in Sections 4-6 of the Storm Water Management Program.

Resources:

1. **School Oriented Fact Sheets from the Corona-Norco Unified School District Storm Water Management Program developed by AEI-CASC Engineering.**
2. **California Storm Water Quality Association, California Best Management Practice Handbook – Municipal, provides an extensive resource of information related to pollution prevention via source controls. In particular, Section 3 of the Handbook is very useful. http://www.cabmphandbooks.com/Documents/Municipal/Section_3.pdf**

Appendix O – Transportation Facility Storm Water Management Resource Materials

The resource materials included in this appendix are intended to serve as guidance for the development of BMPs as part of the Elk Grove Unified School District Storm Water Management Program. The resource materials are general in nature and are not specific to the District, and therefore cannot be interpreted to convey any specific commitment or content of the BMPs that will ultimately be developed and included in the Elk Grove Unified School District Storm Water Management Program. All commitments being made by the Elk Grove Unified School District with respect to the Storm Water Management Program are set forth in Sections 4-6 of the Storm Water Management Program.

Resources:

1. **California Storm Water Quality Association, California Best Management Practice Handbook – Industrial Commercial provides extensive guidance on developing and implementing a SWPPP at sites subject to the General Industrial Permit, such as the District's Student Support Center where the District houses its school bus fleet (extensive document, copies not provided in this appendix).**
   http://www.cabmphandbooks.com/documents/Industrial/IndustrialCommercial.pdf
2. **The School Insurance Authority has been assisting Elk Grove Unified School District and other school districts with compliance with the General Industrial Permit for school transportation facilities. The SIA web site provides monitoring forms to assist in meeting monitoring requirements for sites subject to the General Industrial Permit.**
   http://www.sia-jpa.org/prevention_services/inspection.htm